



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

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October 5, 2025

Chris Willms
Municipal Services Office- Eastern Region
8 Estate Lane, Rockwood House
Kingston, ON K7M 9A8

Dear Mr. Willms,

Re: ERO 025-0940 City of Ottawa - Approval to amend a municipality's official plan

Please accept the below from the Greater Ottawa Home Builders' Association (GOHBA) and its members as its submission to the government's request for feedback on *City of Ottawa- Approval to amend a municipality's official plan* (ERO 025-0940).

GOHBA has been the proud voice for the Ottawa home building community since 1951. Our 440 members include builders, developers, professional renovators, trade contractors, suppliers and manufacturers serving the residential construction and professional renovation industry.

GOHBA urges the Minister to reject the proposed changes to Ottawa's Official Plan as detailed in OPA 46. Our reasons are three-fold:

- 1) The proposed changes do not result in greater consistency with the 2024 Provincial Planning Statement;
- 2) None of the changes proposed in OPA 46 promote or facilitate more housing; and
- 3) Most importantly, the items we highlight below actively work against the provision of more housing in both the built up and rural areas of the City.

At a high level, our concerns are:

- Changes to Section 3.1 do not provide for a reasonable assessment of a private urban boundary application and reserves all lands adjacent to highways for employment areas without being properly assessed and designated;
- Changes to Section 3.4 do not allow the possibility of connecting to village services and infrastructure;

- Changes to Section 4.5.1 seek to reintroduce a municipal heritage register for non-designated properties, which is contrary to legislative changes that the Province recently made;
- A new Section 4.13 designates the entire rural area as protected for the agricultural system, which reduces the range of permitted uses, and will add time and cost to any rural development by allowing the City to demand an Agricultural Impact Assessment for any new or expanding non-agricultural use in the Rural Countryside designation; and,
- Changes to Section 11.6 limits flexibility to modify site specific boundaries between the downtown, inner urban and outer urban transects outside of comprehensive municipal process.

We also have concerns about OPA 47 (which we understand has been recently submitted to the Ministry or will be shortly) and changes in Omnibus 3 pertaining to Volume 1 of Ottawa’s Official Plan. We highlight these concerns following our detailed comments on OPA 46.

Detailed Comments on Official Plan Amendment 46

GOHBA has significant concerns with some of the proposed amendments:

A) Number #1.4 / OP Section 3.1

Section 3.1 is deleted in its entirety and replaced with the following text:

3.1 Designate Sufficient Land for Growth

...

5) Updates to the time horizon of this Plan and the associated population, housing, and employment projections in Table 1 shall only occur through an Official Plan update under Section 26 of the *Planning Act* so that one single set of growth projections is used to update the corresponding City master plans through a single holistic and orderly process.

6) The consideration of urban area and/or village expansion to accommodate the growth projections between the 15-year minimum to the end time horizon of Table 1 should occur through an Official Plan update under Section 26 of the *Planning Act* so that a single comparative process identifies the lands best suited to implement the strategic directions of this Plan and is cost efficient.

7) Applications for urban area or village expansions may be considered in between Official Plan updates under Section 26 of the *Planning Act* to maintain the 15-year minimum of residential development opportunities.

...

10) Applications for a contiguous expansion to the urban area or village shall assess the following criteria to provide Council with sufficient information in their consideration of the application:

a) There is insufficient land within the urban area and villages to accommodate the following thresholds as applicable:

i) The ability of projected housing growth as identified in Table 1 without amendment

ii) 15 years of projected housing growth on existing designated and available lands as identified in Table 1 without amendment;

iii) the projected employment growth to the time horizon identified in Table 1;

GOHBA Comments:

Updates to population, housing, and employment projections should be permitted outside of comprehensive reviews if it is demonstrated that there is insufficient land available according to PPS requirements and other OP policies.

An OPA that seeks to update the OP to be consistent with the 2024 PPS must be consistent with the 2024 PPS in and of itself and in its entirety. An OPA purporting to be for the purpose of updating the OP to be consistent with the 2024 PPS should not be able to disregard major sections of the 2024 PPS. This would include being consistent with 2024 PPS 2.1(1) that directs planning authorities to base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance (MOF) which may only be modified ‘as appropriate’.

Proposed OP 3.1 Subsections 5-7 and 10 create circular logic which would never provide for the conditions to approve a private boundary expansion application. This is contrary to the statutory right of being able to submit an official plan amendment application.

Moreover, in order to be consistent with the 2024 PPS, a private application by necessity must use the most up to date population projections from the Ministry of Finance (and indeed PPS 2024 directs that all decisions be made in the context of updated projections).

A Council decision on a private application based on existing OP Table 1 projections (which are from 2019) would not be in compliance with the 2024 PPS.

Further revisions are required to be made to proposed OP 3.1 in order for it to be consistent with the 2024 PPS. Further discussions are required.

B) Number #1.4 / OP Section 3.1

Section 3.1 is deleted in its entirety and replaced with the following text:

3.1 Designate Sufficient Land for Growth

...

9) Lands with proximity to a goods movement highway interchange, including future interchanges, are protected for future Industrial and Logistics uses and any residential development adjacent to such lands should incorporate any appropriate proximity-mitigation measures or features deemed necessary commensurate to the Industrial and Logistics uses solely within the residential portion of development. The extent of the area to be protected for future Industrial and Logistics shall consider the suitability and the land need of the candidate lands for Industrial and Logistics that is commensurate to accommodate projected employment including Industrial and Logistics uses, or the strategic importance of the location for future Industrial and Logistics and the targeted uses. The extent of the area to be protected for Industrial and Logistics may be delineated through:

- a) An Official Plan update under Section 26 of the *Planning Act* that updates growth projections in Table 1 to this Plan and adds lands to the settlement area, or
- b) An Official Plan Amendment application to expand a settlement area in proximity to a goods movement highway interchange.

GOHBA Comment:

GOHBA contends that this clause goes far beyond the PPS. It is too arbitrary to reserve all lands adjacent to highways for logistic and employment areas without being assessed through a public process for the proposed use and then being designated for that specific use.

Reserving lands for future employment area should be supported by a comprehensive study. Further, this reads as though it is incumbent on residential developers to implement 100% of the mitigation, even if the potential employment lands are vacant, and even if the future industrial lots are sufficiently large to accommodate buffering.

How is required mitigation to be determined in the absence of knowledge of what may be proposed on future employment lands. There are many unknown variables and details that are required to be determined before this policy should be included in the OP.

This proposed amendment is premature and should not be approved at this time. Further discussions and study are required.

C) Number #1.9 / OP Section 3.4

8) To support villages as the focus areas of rural growth, a country lot subdivision may be transferred to a different location within the Rural Countryside area through new applications for plan of subdivision and Zoning By-law amendment, provided all of the following conditions are met:

...

c) ~~Notwithstanding Subsection 9.2.3, Policy 5), if on private services,~~ **Where the proposed new location abuts a village boundary** the area of each proposed new lot shall be no less than 0.4 ha **and have private individual services;** ~~but if full municipal services are available for the new lots subject to Policy d) below, lot sizes may be reduced;~~

GOHBA Comment:

If the location abuts a village boundary, why would the City deny even the opportunity to be on village services? This policy will direct village development to use private services which is a less efficient land use and may not represent the most appropriate servicing solution. This policy is contrary to the 2024 PPS, which promotes the use of municipal infrastructure where possible. An OP policy should not prohibit a servicing solution from even being considered.

This proposed amendment is not appropriate and should not be approved at this time.

D) Number #1.13 / OP Section 4.5.1

8) The City may develop strategies to proactively conserve built heritage resources or cultural heritage landscapes that may have potential cultural heritage value, but have not yet been evaluated, in collaboration with communities where possible and appropriate. These strategies may include, but are not limited to, developing and maintaining a publicly accessible inventory of properties or areas of the city that may have potential cultural heritage value or interest but do not have status under the Ontario Heritage Act. Properties included in this inventory may be evaluated and, where appropriate, listed on the City's Heritage Register or designated under Parts IV or V of the Ontario Heritage Act.

GOHBA Comment:

This clause attempts to reintroduce a municipal heritage register for non-designated properties, in contravention of the intent and spirit of Bill 23's legislative amendments to the Ontario Heritage Act which came into effect on January 1, 2023.

This proposed amendment is not appropriate and should not be approved.

E) Number #1.15 / OP Section 4.13 (New)

A new section 4.13 is added with the following text:

4.13 Agricultural System

...

GOHBA Comment:

This entire section is a fundamental change to the OP which should be paused for further consultation. The changes proposed essentially designate the entire rural area, regardless of the current designation or soil capability, as protected for the 'Agricultural System' which restricts permitted uses.

It is not appropriate to use the Greater Golden Horseshoe policies as the basis for these Ottawa OP policies since those policies were created for an area where agricultural lands are in short supply. Ottawa has a very different geographic reality in that it has a very large rural area that contains both agricultural and rural (non-agricultural) areas. An Agricultural System approach is a fundamental change.

These proposed changes will result in significant implications FOR ALL LANDOWNERS in the rural area, and particularly the Rural Countryside designation, as part of the Agricultural System outlined.

The OP policies must not limit the ability of a landowner to prohibit the use of rural lands for non-agricultural purposes despite being part of the Agricultural System.

This proposed amendment is not appropriate and should not be approved.

F) Number #1.15 / OP Section 4.13 (New)

A new section 4.13 is added with the following text:

...

4.13.3 Establish the requirements for agricultural impact assessments

...

2) In addition to the circumstances described in Policy 1), an agricultural impact assessment may be required as part of a complete application in the following circumstances:

...

e) Any other circumstances where, at the sole discretion of the City, the size, scale, nature, location, or type of use is such that an agricultural impact assessment is required to demonstrate how impacts on the agricultural system are avoided and, where avoidance is not possible, minimized and mitigated.

GOHBA Comment:

Proposed policy 2) e) is impossibly broad and could lead to requirements and conditions that are subjective and therefore overly challenging to fulfill.

This proposed amendment is vague and should not be approved at this time. Further discussions and study are required.

G) Number #1.34 / OP Section 11.6

18) The boundaries of transect areas and overlays shall not be modified unless through an Official Plan update in accordance with Section 26 of the *Planning Act*.

GOHBA Comment:

While we appreciate the intent of this policy is likely to prevent the boundary between the Suburban and Rural Transects being modified in this manner, which would result in an urban boundary expansion, , this clause as written prevents flexibility to adjust the boundaries between the downtown, inner urban and outer urban transects which is overly restrictive and problematic.

The OP should permit amendments to the boundaries of transects/overlays on a site-specific basis. This may be required in instances justified through studies, such as for land swaps or refining aggregate/landfill impact assessment setbacks.

This proposed amendment is not appropriate and should not be approved at this time. Further discussions and revisions are required.

H) Numbers #3.35 & #3.36 / OP Section 7.3

Volume 1, Section 7.3

...

2) e) Development, lot line adjustments and site alteration are not permitted in Significant Wetlands, **except where lot creation or lot line adjustment is required to support the conveyance of the undeveloped portion of the property to a public agency or a non-profit corporation or non-profit land trust for long-term conservation for environmental protection.**

...

3) a) Development lot line adjustments and site alteration are prohibited in Natural Environment Areas, **except where lot creation or lot line adjustment is required to support the conveyance of the undeveloped portion of the property to a public agency or a non-profit corporation or non-profit land trust for long-term conservation for environmental protection.**

GOHBA Comment:

Significant Wetlands and Natural Environment Areas are designated in OP Schedules but only at a high level – ground truthing is required, which made lead to reasonable lot line adjustments and site alterations. This clause needs to provide more flexibility in this regard.

This proposed amendment is not appropriate and should not be approved at this time. Further discussions and revisions are required.

Additional Comments

GOHBA is also concerned about OPA 47 and changes in Omnibus 3 pertaining to Volume 1 of Ottawa’s Official Plan.

Official Plan Amendment 47

OPA 47 proposes to bring the technical studies indicated in the Development Application Study Policy Bylaw into the OP without any consideration of the intent or spirit of the provincial government’s Bill 17 changes – which states that the Province will, by Regulation, direct what studies must be requested. OPA 47 is Ottawa’s attempt to circumvent the direction of the Province.

Changes in OPA 47 are not related to consistency with PPS 2024 and need to be approved by the Minister.

In particular, Schedule 7 of Bill 17 amends the *Planning Act* (adds section 17(21.1 and 21.2)) to limit complete application (studies/reports) requirements, and establish new regulation-making authority that enables the Minister of Municipal Affairs and Housing to further regulate the reports or studies required as part of a complete application, including:

- prescribing a list of subject matters for which studies cannot be required as part of a complete application; [and]
- identifying the only studies that could be required as part of a complete application.

The provincial government is specifically proposing that reports on Sun/Shadow, Wind, Urban Design and Lighting may not be required as part of a complete planning application.

Bringing over the technical studies outlined in Ottawa’s current Development Application Study Policy Bylaw into the OP is premature at this time. OPA 47 as proposed by Ottawa should not be approved at this time. GOHBA requests to participate in any discussions as to what studies may be appropriate to request as part of an application.

Omnibus 3

The proposals in Omnibus 3 generally pertain to Volume 2 of the OP and are acceptable, but for some reason include a change to Section 7.3 in Volume 1, that would only allow lot line adjustments and site alteration for Significant Wetlands and Natural Environment Areas for non-profit developments, and not for market developments that house more than 90% of the population.

There are two amendments contained in the City's Omnibus 3 that are of concern because they are specifically not housekeeping amendments:

Items 32 and 33, which amend Volume 1, Section 7.3, Policies 2 and 3.

...

2) e) Development, lot line adjustments and site alteration are not permitted in Significant Wetlands, **except where lot creation or lot line adjustment is required to support the conveyance of the undeveloped portion of the property to a public agency or a non-profit corporation or non-profit land trust for long-term conservation for environmental protection.**

...

3) a) Development lot line adjustments and site alteration are prohibited in Natural Environment Areas, **except where lot creation or lot line adjustment is required to support the conveyance of the undeveloped portion of the property to a public agency or a non-profit corporation or non-profit land trust for long-term conservation for environmental protection.**

GOHBA Comment:

These are not corrections or housekeeping amendments but rather should be included in OPA 46 in which case the comments above, relevant to OPA #1.34 also apply.

Significant Wetlands and Natural Environment Areas are designated in OP Schedules but only at a high level – ground truthing is required, which made lead to reasonable lot line adjustments and site alterations. These clauses need to provide more flexibility in this regard.

These amendments should not be approved.

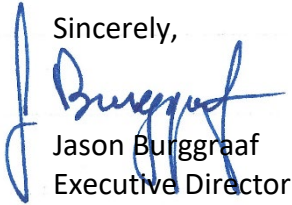
Conclusion

None of the changes in OPA 46 are necessary as they do nothing to promote or facilitate more housing, and they actively work against the provision of more housing in both the built-up and rural areas of the City.

We urge the Minister to reject the proposed changes.

We thank the Ministry for the opportunity to comment. We are pleased to answer questions or provide further information as requested.

Sincerely,

A handwritten signature in blue ink, appearing to read "Burggraaf", is written over a horizontal line. The signature is stylized and cursive.

Jason Burggraaf
Executive Director