8. Settlement of some Appeals to OPA 150

Règlement de certains appels relatifs à la MPO 150

COMMITTEE RECOMMENDATION, AS AMENDED

That Council approve the modifications to the Policies in OPA #150 as detailed in this report and included in Document 1, <u>as amended by the removal of the words "High-Rise and" from the beginning of Policy 15 of Item 40 in Document 1.</u>

RECOMMANDATION DU COMITÉ, TELLE QUE MODIFIÉE

Que le Conseil approuve les modifications aux politiques prévues dans la MPO 150, qui sont précisées dans le présent rapport et incluses dans le document 1, telles qu'elles ont été changées par la suppression des termes « immeuble de grande hauteur et » au début de la politique 15 qui figure au point 40 dans le document 1.

DOCUMENTATION/DOCUMENTATION

- Director's Report, Economic Development ad Long Range Planning, Planning, Infrastructure and Economic Development Department dated September 13, 2018 (ACS2018-PIE-EDP-0047)
 - Rapport du directeur, Développement économique et Planification à long term, Direction générale de la planification, de l'Infrastructure et du développement économique daté le 13 septembre 2018 (ACS2018-PIE-EDP-0047)
- 2. Extract of draft Minutes, Planning Committee, September 25, 2018
 - Extrait de l'ébauche du procès-verbal, Comité de l'urbanisme, le 25 septembre 2018

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COMITÉ DE L'URBANISME RAPPORT 70 LE 10 OCTOBRE 2018

Report to Rapport au:

Planning Committee
Comité de l'urbanisme
25 September 2018 / 25 septembre 2018

and Council et au Conseil 10 October 2018 / 10 octobre 2018

Submitted on September 13, 2018 Soumis le 13 septembre 2018

Submitted by
Soumis par:
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Ward: CITY WIDE / À L'ÉCHELLE DE LA File Number: ACS2018-PIE-EDP-0047

VILLE

SUBJECT: Settlement of some Appeals to OPA 150

OBJET: Règlement de certains appels relatifs à la MPO 150

REPORT RECOMMENDATION

That Planning Committee recommend Council approve the modifications to the

Policies in OPA #150 as detailed in this report and included in Document 1.

RECOMMANDATION DU RAPPORT

Que le Comité de l'urbanisme recommande au Conseil d'approuver les modifications aux politiques prévues dans la MPO 150, qui sont précisées dans le présent rapport et incluses dans le document 1.

BACKGROUND

Council approved Official Plan Amendment #150 (OPA #150) on December 11, 2013. The amendment was approved by the Minister of Municipal Affairs and Housing, without modification, on April 24th, 2014. Thirty-two appeals were received in response to the Minister's approval. The Greater Ottawa Home Builders Association (GOHBA), the Building Owners and Managers Association (BOMA) and a number of their member companies lodged appeals to the parts of OPA #150 that are the subject of this report.

Following Council direction, staff met with the appellants and brought forward OPA#140 and OPA #141 to address some of the matters that were appealed. OPA #140 and #141 were also subsequently appealed. In response to motions made by appellants, the OMB directed the City to bring forward a further amendment to address Employment and Agricultural lands and the extension of the planning horizon to the year 2034. When approving OPA #180 in December 2016 Council also directed staff to continue discussions towards settling the outstanding appeals of OPA 150 and by connection OPAs #140 and #141. OPA #180 addressed many of the matters appealed in the earlier amendments.

Staff has continued to work with the appellants of OPA #150, #140 and #141 with the result that many appeals have been withdrawn. This report brings forward recommendations for those policies in OPA #150 that have been appealed by GOHBA and BOMA and where the revised wording proposed has been agreed to by all parties.

This report recommends that Council approve the mutually agreed upon wording in the policy changes as detailed Document 1, and that the City Solicitor bring these changes to the Local Planning Appeals Tribunal (LPAT) for approval as part of settlement of the GOHBA and BOMA in the appeal of OPA #150

DISCUSSION

GOHBA and BOMA's appeals relate to new or amended policies in the following Broad categories:

- Density requirements vs. density targets;
- Secondary Plans;
- Policies dealing with High-rise 31+ buildings and where they may be considered;
- Development permitted in Mixed-use Centres and Mainstreets;
- Residential mix in new communities; and
- Parking policies.

Document 1, attached to this report, identifies the policy changes made by OPA 150 grouped under these subject categories, and the associated recommended changes shown with highlighted text.

Density Requirements vs. Targets

The City introduced Minimum Density Targets through OPA 76 in 2009 for the Central Area, Town Centres, Mixed Use Centres, Mainstreets and the community core area in Riverside South. These areas are all locations on the City's Rapid Transit or Transit Priority Network and the Official Plan identified target densities for each location. These densities represent the minimum number of residents or jobs needed per hectare to support a viable transit system in the long-term.

One of the changes made to these policies, by OPA #150, was the replacement of the term "density targets" with the term "density requirements". The Industry appealed this change in terminology because they saw this as a step to force all new development to achieve these densities immediately and with no recognition that development could be phased or that some sites may not be able to accommodate the required density. The Transit Orientated Development (TOD) plans undertaken for the eastern Confederation Line Stations, which predated OPA 150, accommodated phased development and recognised that not all sites have the same ability to accommodate increased density. Since OPA 150 was adopted, Secondary Plans for most of the LRT stations have been completed and allow similar consideration of existing uses and phased development.

The intent behind the density provisions is clearly to take advantage of the proximity to rail and, in hindsight, the change in terminology did not adequately take into account the variety of urban contexts in which these density aspirations apply. As a consequence, staff recommend that the term "density targets" be reinstated in those policies amended by OPA #150 and the new policy, added by OPA #150, in Item 36 be amended accordingly. The question of how to achieve appropriate transit-supportive densities in various urban contexts will be re-examined in the next Official Plan.

The proposed changes to OPA #150 are identified with highlighted text as Items 35-37, 39, 42-44 and 88 in Document 1.

Policies Dealing with High-rise and High-rise 31+ Buildings

Three distinct changes are proposed:

1. Where High-Rise Buildings should be located

Official Plan Amendment#150 created a new group of Policies in Section 2.2.2 titled "Intensification and Building Height" that is intended to bring some direction to where high-rise buildings should be located. This section revisited the building height categories added by OPA #76 and created two classes of high-rise buildings, being those buildings 10-30 storeys in height, and those of 31 storeys or more in height. The Appeals of these policies related to the combination of criteria imposed on the future location of new high-rise buildings. The policy first required a secondary plan to permit high-rise 31+, but also required them to only be in specific designations and only in proximity to transit stations. In some cases, these additional restrictions imposed by the designation eliminated large redevelopment sites adjacent to stations. Staff agree that the narrowing of the opportunities for high-rise buildings using specific designations was too restrictive and defeats the intent to encourage transit supportive development at transit stations. The policy change removes the limitation to specific designations but requires a Secondary Plan and proximity to transit.

The proposed change is shown with highlighted text as Item 40 in Document 1

2. Criteria for High rise buildings in Secondary Plans

Section 2.5.6 deals with the format and content of future Secondary Plans and Community Design Plans where high-rise buildings and buildings of 31 storeys or more may be considered. The purpose of the changes to the policies is to clarify

those matters that the City will address when preparing these plans. The industry's concern was that proponents of new buildings would be required to undertake these studies. The wording of policies 12-14 have been amended to be clearer – the studies will be undertaken by the City, and the results would form part of the work plan for new Secondary Plans or Community Design Plans.

The proposed Policies 12-14 of Section 2.5.6 which deal with Secondary Plans and Community Design Plans have also been updated as identified with highlighted text as Item 127 in Document 1.

3. Building heights in the General Urban Area

The General Urban Area is home to the majority of the City's residential neighbourhoods but permits a wide range of land use and building forms. The changes proposed by OPA 150 were intended to bring more direction to where taller buildings would be considered. The policies continue to acknowledge that the predominant building form will be low-rise (up to four storeys in height) but there are many locations where the land has been zoned for, and in many cases developed with, taller buildings. The policies introduced in OPA #150 to maintain existing Low-Rise neighbourhoods but allow taller buildings in specific locations, were very convoluted making them hard to interpret in different neighbourhood contexts. The proposed changes try to simplify and clarify under what circumstances taller buildings will be considered.

The revised policies 3 and 4 of Section 3.6.1, which deals with the General Urban Area, have been updated with highlighted text in Item 137 in Document 1.

Residential Mix in New Communities

Section 2.2.2 Policy 24 of the City's Official Plan currently requires that all new communities located outside the NCC Greenbelt, and which are subject to a Community Design Plan, are to provide a housing mix that provides not less than 45 per cent single detached dwellings. This policy was not changed by OPA#150 however GOHBA had requested that the City consider reducing the minimum percentage of singles that is required. Council, based upon staff recommendations has approved a number of recent amendments to the Official Plan to reduce the proportion of singles in new suburban neighbourhoods to 30 percent of the total units. In each of these cases the residential density proposed for the new communities met or exceeded the density objectives of the Official Plan (34 units per ha).

Staff supported the site specific changes in each of the earlier amendments and agree that it is an appropriate time to make the change for all new communities. It does not prevent more singles being built in the future should the market demand increase.

Policy Section 2.2.2 Policy 24 was modified to reduce the required minimum percentage of singles in new developments to 30 percent of the overall housing mix.

Parking Provisions

OPA #150 made significant changes to the transportation policies in Section 2.3.1 of the Official Plan. Both GOHBA and BOMA appealed the changes to the parking policies, primarily those policies indicating that the city may amend zoning regulations to establish maximum limits on the number of parking spaces that will be permitted on sites close to transit facilities. The industry is concerned that the City may impose these limits arbitrarily and in locations where the rapid transit facilities are not in place. The City already has by-law provisions establishing maximum parking rates around the proposed transit stations. However, staff agreed that modifications to the new parking policies proposed in Items 83 and 84 of Official Plan Amendment #150 were warranted to remove some duplication, and to be clear that the City will always consider the context and the timing of rapid transit service when proposing new limits on the maximum number of parking spaces. The changes in text are shown with highlighted text in Items 83 and 84 in Document 1.

Secondary Plans

Section 2.5.6 of the Official Plan addresses Secondary Plans and Community Design Plans, and lays out the matters that need to be considered when undertaking these planning exercises. OPA #150 made significant changes to the text of this section. GOHBA requested reconsideration of these policies to:

- a) clarify the confusion about when a Secondary Plan is or is not required; and
- b) clarify what Secondary Plans need to consider where High-Rise buildings and Buildings 31 storeys or more are proposed.

The Policies 6 – 8 have been reworded to clarify that Secondary Plans and Community Design Plans will reference and enhance but not duplicate Official Plan policies or other City guidelines. The original confusion, concerning when a Secondary Plan or Community Design Plan was necessary, has been removed. The reworded policies are shown in highlighted text in Items 123 and 124 in Document 1.

Policies 12–16 of Section 2.5.6 that deal with the studies and design elements addressed in Secondary Plans which will relate to High-Rise and High-Rise 31+ buildings have been condensed and clarified so that it is clear that the studies referenced will be conducted by the City and are not requirements imposed on individual builders. The changes to policies are shown in highlighted text in Item 127 of Document 1.

Policy 1 in Section 4.1 of the Official Plan deals with the role and authority of Site Specific Policies and Secondary Plans. Until OPA 150, Secondary Plans could be more restrictive but not less restrictive than the parent Official Plan. OPA 150 proposed that Secondary Plans could allow greater building heights than what the Official Plan permitted as of right. Policy 1 clarifies this so that a Secondary Plan can be less restrictive in a specific matter where a policy in the Official Plan authorised that to be the case.

The policy changes to Policy 1 are shown in highlighted text in Item 238 in Document 1.

Mixed Use Centres and Mainstreets

Mixed Use Centres and Mainstreets are the designations where the greatest intensification is anticipated. OPA#150 proposed that building heights in Mixed Use Centres would be limited to 12 storeys in height until such time as the a Secondary Plan is adopted. The Secondary Plan would determine if and where taller buildings would be appropriate. Since the adoption of OPA 150, all of the Mixed Use Centres either have had a Secondary Plan adopted for them or have one that is in process. Policies already discussed in this report provide mechanisms for Secondary Plans to deal with building height. Therefore policies 3- 5 in Section 3.6.2 have been modified to be less specific on building heights since any increase in height will be controlled by Secondary Pans. The changes to the Mixed Use Centre policies are shown in highlighted text in Item 146 in Document 1.

The policies for Traditional and Arterial Mainstreets were amended by OPA 150. These designations apply to properties that front onto streets where change is anticipated and pedestrian and transit- oriented land uses are encouraged. These Mainstreet designations supersede the designation of the surrounding area to the depth of the lot fronting the street. However, in some cases, some very deep lots front these streets. OPA#150 proposed that for these deep lots the Mainstreet designation would be generally limited to a depth of 200 metres. The industry was concerned that while this

general limitation generously reflects the depth of lots on Traditional Mainstreets it did not reflect the typical lot fabric adjacent to many Arterial Mainstreets. They did recognise that some lots fronting Arterial Mainstreets can be extremely large. GOHBA suggested the proposed depth limit for Arterial Mainstreets should be increased to 400m to reflect the general depth of the lots found on these streets. Having reviewed the existing lot fabric Staff agree that the Arterial Mainstreet designation should generally be increased to a limit of 400m. Changes to Policy 2 to increase the depth for Arterial Mainstreets are shown in Highlighted text in Item 158 in Document 1

Building heights for Traditional Mainstreets were to be limited to Mid-Rise buildings of six storeys in height in OPA 150 with the proviso that greater heights can be considered by a Secondary Plan. The industry argues that in many cases the City has already approved Mid-Rise buildings up to 9-storeys in many Arterial Mainstreet locations. Staff agree that in some cases taller building should be considered based upon individual circumstances. The changes to Policy 11 are shown in highlighted text in Item 161 in Document 1.

RURAL IMPLICATIONS

None of the policy changes proposed as part of this Settlement impact the Rural Area.

CONSULTATION

No public consultations was undertaken as part of this settlement. All parties to the policies under appeal were advised on the settlement reached between the City and GOHBA and BOMA.

COMMENTS BY THE WARD COUNCILLORS

This is a city-wide report – not applicable.

LEGAL IMPLICATIONS

As noted in the Disposition, the next pre-hearing on OPA 150 and related matters is scheduled to take place on October 22, 2018. Should the proposed modifications be endorsed by Council, the modifications will be brought forward to the Local Planning Appeal Tribunal for approval.

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RISK MANAGEMENT IMPLICATIONS

The policy changes recommended by this report are part of a settlement negotiation between the City and the Greater Ottawa Home Builders (GOHBA) and the Building Owners and Managers Association (BOMA). If the recommended changes are not approved by Council then the City will be required to defend the original policies at a Local Planning Appeals Tribunal (LPAT) Hearing.

ASSET MANAGEMENT IMPLICATIONS

There are no asset management implications with the recommendations contained within this report.

FINANCIAL IMPLICATIONS

There are no direct financial implications.

ACCESSIBILITY IMPACTS

There are no accessibility impacts associated with this report.

ENVIRONMENTAL IMPLICATIONS

There are no environmental implications associated with this report.

TERM OF COUNCIL PRIORITIES

This project addresses the following term of Council priorities:

- EP2 Support growth of local economy
- HC3 Building Better Revitalized Neighbourhoods
- GP1 Improved Public Engagement in Planning Matters

SUPPORTING DOCUMENTATION

Document 1 Settlement Policy Changes (GOHBA and BOMA)

DISPOSITION

The City Solicitor is directed to take the changes recommended by this report to the Prehearing of the Local Appeals Tribunal of October 22, 2018 or the Hearing of October 23, 2018 with the request that the Tribunal approve the policies as amended.

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Document 1 – Settlement Policy Changes

ITEM	SECT	OPA 150	Proposed Changes			
Density Targets vs Requirements						
35	2.2.2	 Minimum density requirements, expressed in jobs and people per gross hectare, are set out in Figure 2.3 and applied to those target areas with the greatest potential to support the Rapid Transit and Transit Priority Networks. Figure 2.3- Minimum Density Requirements 	Repeal OPA 150 Item 35 a) to reinstate density targets in place of Density requirements Amend Figure 2.3 to replace the word "Requirements" with the word "Targets"			
36	2.2.2	6. All new development within the boundaries of the intensification target areas listed in Figure 2.3 will be required to meet the minimum density <i>requirements</i> . Higher or lower densities may be permitted in a secondary plan that re-allocates density among sites. The Zoning By-law will convert the <i>requirements</i> in Figure 2.3 from gross density to net density and from people and jobs per hectare to dwelling units and gross floor area.	6. New development within the boundaries of the intensification target areas listed in Figure 2.3 will be encouraged to meet the minimum density targets. Higher or lower densities may be permitted in a secondary plan, for a target area, where that Plan reallocates density among sites to achieve the overall objective of people and jobs. Where phased development is proposed the proponent must demonstrate how the density target will be achieved at build out. Where implemented through Secondary plans and Zoning, the targets in Figure 2.3, will be converted from gross density to net density and from people and jobs per hectare to dwelling units and			

ITEM	SECT	OPA 150	Proposed Changes		
			gross floor area equivalents.		
37	2.2.2	7. At the time of implementation, the Zoning By-law may provide exemptions from the minimum density requirements included in Figure 2.3 for circumstances such as minor additions to and changes in use of existing buildings without the requirement for an amendment to this Plan.	7. At the time of implementation, the Zoning By-law may provide exemptions from the minimum density targets included in Figure 2.3 for circumstances such as minor additions to and changes in use of existing buildings without the requirement for an amendment to this Plan.		
39	2.2.2	8. Where intensification target areas also correspond with Heritage Conservation Districts designated under the <i>Ontario Heritage Act</i> the achievement of intensification targets and minimum density requirements will be determined in part by the requirements of the <i>Ontario Heritage Act</i> . Projects that do not meet the relevant Heritage Conservation District guidelines or plan will not be recommended for approval under the <i>Ontario Heritage Act</i> .	8. Where intensification target areas also correspond with Heritage Conservation Districts designated under the <i>Ontario Heritage Act</i> the achievement of intensification targets and minimum density targets will be determined, in part, by the requirements of the <i>Ontario Heritage Act</i> . Projects that do not meet the relevant Heritage Conservation District guidelines or plan, will not be recommended for approval under the <i>Ontario Heritage Act</i> .		
42	2.2.2	16. The City will monitor and report annually on the pattern and amount of residential intensification and the contribution made by the intensification that occurs within the target areas to the city-wide target identified in Section 2.2.2, Policy 3. Progress made in achieving the density <i>requirements</i> identified in Figure 2.3 will be	16. The City will monitor and report annually on the pattern and amount of residential intensification and the contribution made by the intensification that occurs within the target areas to the city-wide target identified in Section 2.2.2, Policy 3. Progress made in achieving the density targets identified in Figure 2.3		

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ITEM SECT	OPA 150	Proposed Changes		
43 2.2.2	assessed at the time of a comprehensive review of the Official Plan, at which time adjustments may be considered. 13. In order to implement the minimum density	will be assessed at the time of a comprehensive review of the Official Plan, at which time adjustments may be considered. 13. In order to achieve the minimum density targets for		
	requirements for all lands in target areas for intensification, the City will: a. Review and may update existing community design plans, secondary plans, and zoning to enable achievement of the minimum density requirements. Any necessary amendments will be carried out in consultation with the landowners and local community. Where community design plans, secondary plans or existing zoning provisions contain sufficient development potential to meet minimum density requirements, these requirements shall not be used as the only planning rationale to revise such plans for the purpose of achieving intensification, or to increase the height or density in the current zoning; b. Consider the application of a number of alternative measures to provide capacity, including risk management and/or system upgrades in	 the transit "target areas for intensification", in Figure 2.3, the City will: a. Review and may update existing community design plans, secondary plans, and zoning to enable achievement of the minimum density targets. Any necessary amendments will be carried out in consultation with the landowners and local community. b. Consider the application of a number of alternative measures to provide capacity, including risk management and/or system upgrades in conjunction with its Asset Management Strategy and other City programs where opportunities for intensification are limited because of the cumulative impact of intensification projects on infrastructure system capacity. 		

ITEM	SECT	OPA 150	Proposed Changes
		conjunction with its Asset Management Strategy and other City programs where opportunities for intensification are limited because of the cumulative impact of intensification projects on infrastructure system capacity.	
44	2.2.2	j. Consider the achievement of minimum density requirements on Arterial Mainstreets to represent a longer-term potential, and those Arterial Mainstreets located inside the Greenbelt will be considered to have priority for municipal upgrades over those outside the Greenbelt. On Traditional and Arterial Mainstreets, carry out measures to enhance the pedestrian environment and public realm, such as tree planting, improved sidewalks, and other streetscape improvements, as well as traffic calming measures to help transform these streets from wide, automobile-oriented streets, to urban avenues that exhibit more liveable conditions;	j. Consider the achievement of minimum density targets on Arterial Mainstreets to represent a longer-term potential, and those Arterial Mainstreets located inside the Greenbelt will be considered to have priority for municipal upgrades over those outside the Greenbelt. On Traditional and Arterial Mainstreets, carry out measures to enhance the pedestrian environment and public realm, such as tree planting, improved sidewalks, and other streetscape improvements, as well as traffic calming measures to help transform these streets from wide, automobile-oriented streets, to urban avenues that exhibit more liveable conditions;
88	2.3.2	In order to provide sufficient water and wastewater system capacity to assist in meeting the City's	Repeal OPA 150 Item 88 a) to reinstate the term "targets" in place of the term "requirements"

2. In order to provide sufficient water and wastewater

intensification requirements inside the Greenbelt, the

ITEM	SECT	OPA 150	Proposed Changes		
		City will:	system capacity to assist in meeting the City's intensification targets inside the Greenbelt, the City will:		
122	2.5.6	 5. Community design plans and other area-specific plans in developed areas will include the following: a. A plan of how the land will develop or re-develop over time, including land uses, open space, public rights-of-way for roads and transit, and connections for walking and cycling; b. Analysis of how the proposed development will achieve the minimum number of jobs and the density and mix of residential units required by policies in this Plan; where applicable, the density requirements in Figure 2.3 may be achieved overall by assigning different levels of density to individual sites; 	 5. Community design plans and other area-specific plans in developed areas will include the following: a. A plan of how the land will develop or re-develop over time, including land uses, open space, public rights-of-way for roads and transit, and connections for walking and cycling; b. Analysis of how the proposed development will achieve the minimum number of jobs and the density and mix of residential units required by policies in this Plan; where applicable, the density targets in Figure 2.3 may be achieved overall by assigning different levels of density to individual sites; 		
		 c. Identification of stable areas and areas suitable for intensification, based on proximity to transit and compatibility with the current or planned character of the surrounding area; 	 c. Identification of stable areas and areas suitable for intensification, based on proximity to transit and compatibility with the current or planned character of the surrounding area; 		
		d. Building heights and minimum densities for	d. Building heights and minimum densities for		

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ITEM	SECT	OPA 150	Proposed Changes
		development parcels or areas within the planning area;	development parcels or areas within the planning area;
		e. Planning and design strategies to support walking and cycling and increased use of transit;	e. Planning and design strategies to support walking and cycling and increased use of transit;
		f. Measures to improve the natural heritage system and reduce the impact of development on it;	f. Measures to improve the natural heritage system and reduce the impact of development on it;
		g. Requirements for public facilities such as parks, schools, cycling facilities and sidewalk improvements and measures to secure them;	 g. Requirements for public facilities such as parks, schools, cycling facilities and sidewalk improvements and measures to secure them;
		h. An assessment of water, wastewater and stormwater infrastructure, including any planned upgrades or known constraints, and measures to address shortfalls; and	h. An assessment of water, wastewater and stormwater infrastructure, including any planned upgrades or known constraints, and measures to address shortfalls; and
		 i. A section indicating the circumstances under which changes to the plan would need approval of Council. 	 i. A section indicating the circumstances under which changes to the plan would need approval of Council.
			j. A phasing plan where it is proposed that development of a site will be phased and that residential and employment targets, identified in section 2.2.2, may not be met at every phase but

ITEM	SECT	OPA 150	Proposed Changes		
			the proponent demonstrates how the targets will be		
			achieved or exceeded at overall build out.		
High-	Rise and	I High Rise 31+ Buildings			
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40	2.2.2	Intensification and Building Height	Intensification and Building Height		
		10. Intensification may occur in a variety of built forms	10. Intensification may occur in a variety of built forms		
		from low-rise to high-rise provided urban design and	from low-rise to high-rise provided urban design and		
		compatibility objectives are met. Taller buildings	compatibility objectives are met. Denser development,		
		should be located in areas that support the Rapid	that often means taller buildings, should be located in		
		Transit and Transit Priority network, in areas with a	areas that support the City's Rapid Transit and Transit		
		mix of uses, and in areas that can accommodate	Priority networks and in areas with a mix of uses.		
		large-scale intensification. Building heights and	Building heights and densities for different areas may		
		densities for different areas may be established	be established through this plan or a secondary plan		
		through this plan or a secondary plan and will be	and will be implemented through zoning. A secondary		
		implemented through zoning. A secondary planning	planning process, identified in Section 2.5.6 and		
		process, identified in Section 2.5.6 and undertaken for	undertaken for a specific area may recommend a new		
		a specific area may recommend a new or changes to	or changes to an existing secondary plan to establish		
		an existing secondary plan to establish different	different building heights. Until more detailed planning		
		building heights. Until more detailed planning is	is completed in this manner this Plan will include		
		completed in this manner this Plan will include	building heights for Target Areas for Intensification.		
		building heights for Target Areas for Intensification.	Low-rise intensification will be the predominant form of		
		Low-rise intensification will be the predominant form of	intensification in the General Urban Area.		
		intensification in the General Urban Area.	11.The distribution of appropriate building heights will be		

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 11. The distribution of appropriate building heights will be determined by: a. The location in a Target Area for Intensification identified in Policy 4 above or by proximity to a Rapid Transit station or Transit Priority corridor, with the tallest building heights generally located closest to the station or corridor; and b. The Design and Compatibility of the development with the surrounding existing context and planned function, as detailed in Section 4.11, with buildings clustered with other buildings of similar height. 12. Building heights are classified in Figure 2.4 and will be used for establishing appropriate height limits in community design plans, secondary plans, the Zoning By-law and other policy plans, in land use designations in Section 3 and when considering amendments to this Plan. The corresponding storey height for a residential use is generally three metres, and for other uses is generally four metres, while atgrade uses may have higher storey heights. Where a secondary plan uses the terms "high-rise" or "high profile", the building class will be limited to High-Rise 	 a. The location in a Target Area for Intensification identified in Policy 4 above or by proximity to a Rapid Transit station or Transit Priority corridor, with the greatest density and tallest building heights being located closest to the station or corridor; and b. The Design and Compatibility of the development with the surrounding existing context and planned function, as detailed in Section 4.11, with buildings clustered with other buildings of similar height. 12. Building heights are classified in Figure 2.4 and will be used for establishing appropriate height limits in community design plans, secondary plans, the Zoning By-law and other policy plans, in land use designations in Section 3 and when considering amendments to this Plan. The corresponding storey height for a residential use is generally three metres, and for other uses is generally four metres, while atgrade uses may have higher storey heights. An amendment to the Zoning By-law will be required for any increase in height within that height class.

ITEM	SECT	T OPA 150				Proposed Changes		
		10-30 unless otherwise indicated in that plan. An amendment to the Zoning By-law will be required for any increase in height within that height class. Figure 2.4				Figure 2.4		
							Maximum Building Height (residential	
		Classificati	Maximum Building tion Height (residential				storeys)	
				storeys)		Low-Rise 4 store	4 storeys or less	
		Low-Rise		4 storeys or less		Mid-Rise	5 to 9 storeys	
		Mid-Rise		5 to 9 storeys		High-Rise	10 to 30 storeys	
		High-Rise	High-Rise 10-	10 to 30 storeys	40	High-Rise 31+	31 storeys and more	
			High-Rise 30+	31 storeys and more	13.	Low, Medium or High	Plan refers to building form as profile they will have the same edium- or High-Rise in Figure 2.4 icated in that Plan.	
		13. Building heights are established in Section 3 and in the following policies. However, secondary plans, including site-specific policies in Volume 2 of this Plan may specify greater or lesser building heights than those established in Section 3 where those heights are consistent with the strategic directions of Section 2. Existing zoning that permits a greater height than				the following policies including site-specific may specify greater those established in	established in Section 3 and in a. However, secondary plans, c policies in Volume 2 of this Plan or lesser building heights than Section 3 where those heights he strategic directions of Section	

ITEM	SECT	OPA 150	Proposed Changes
		set out in this Plan will remain in effect. 14. High-Rise 30+ buildings will only be permitted where	Existing zoning that permits a greater height than set out in this Plan will remain in effect.
		they are identified in a secondary plan that addresses the requirements of Section 2.5.6 and where the buildings are:	15. High-Rise and (removed per motion-No PLC 70/3) High-Rise 31+ buildings will only be permitted: where they are identified in a secondary plan that addresses the requirements of Section 2.5.6; or permitted by an
		a. Located in the Central Area, a Mixed Use Centre or Town Centre; and	amendment to an existing secondary plan that already allows High-rise buildings; and where the High-Rise
		b. Preferably located within 200 metres walking distance of a Rapid Transit Station identified on Schedule D to maximize transit use but will not be considered at a distance beyond 400 metres walking distance; and	 a. located generally within 400 metres walking distance of a Rapid Transit Station, identified on Schedule D, to maximize the use of transit.
		 c. Separated from planned low-rise residential areas by a suitable transition as required by Section 4.11 policies 11 and 12. 	 b. separated from planned low-rise residential areas by a suitable transition as required by Section 4.11 policies 11 and 12.
		15. The Location of High-Rise 10-30 and 30+ buildings is influenced by the need to provide an adequate separation distance from other existing and potential future High-Rise buildings, as detailed in Section 4.11. The Zoning By-law may establish specific separation distances. Development of a High-Rise Building may	16. The Location of High-Rise and High-Rise 31+ buildings is influenced by the need to provide an adequate separation distance from other existing and potential future High-Rise buildings. Separation distances between buildings are to be considered when considering sites for development of a High-Rise Building and High-Rise31+ buildings. The City

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		require consolidation of two or more lots in order to address separation distance requirements. 16. For Official Plan amendments to increase building heights that are established in Section 3 of this Plan, or in a secondary plan, the proponent must demonstrate that the following criteria are met: a. the impacts on the surrounding area (e.g. the community design plan study area) have been assessed comprehensively; b. the direction in Policy 10 above is met; c. the requirements of policies 13 through 16 of Section 2.5.6 where the proposal involves a High-Rise 10-30 or High-Rise 30+ building; and d. an identified community amenity is provided.	may implement separation distances through the Zoning By-law. In areas with a small or narrow lot fabric consolidation of two or more lots may be in order to address separation distance requirements. 17. For Official Plan amendments to increase building heights that are established in Section 3 of this Plan, or in a secondary plan, the proponent must demonstrate that the following criteria are met: a. the impacts on the surrounding area (e.g. the community design plan study area) have been assessed comprehensively; b. the direction in Policy 10 above is met; c. the requirements of policies 13 through 16 of Section 2.5.6 where the proposal involves a High-Rise or High-Rise 31+ building; and d. an identified community amenity is provided.
137	3.6.1	3. Except as provided by Policy 4 below, or by Policy 12 in Section 2.2.2, the maximum building height in the General Urban Area will continue to be low-rise, being four storeys or less, and within this range changes in	 Building height in the General Urban Area will continue to be predominantly Low-Rise. Within this range, changes in building form, height and in density will be evaluated based on compatibility with the

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	height will be evaluated based on compatibility with the existing context and the planned function of the area. The design and compatibility policies in this Plan also apply. The tallest buildings will be encouraged to locate on properties fronting Arterial Roads, or adjacent to existing taller buildings. Existing zoning that permits building heights greater than those in this section will remain in effect. 4. Notwithstanding the building heights specified in Policy 3, greater heights may be considered in the following circumstances and where the urban design and compatible development policies in Section 4.11 are met: a) up to six storeys where the property fronts on and has vehicular access to an Arterial Road on Schedules E or F of this Plan and is located: i) within 800 metres walking distance of a Rapid Transit Station on Schedule D of this Plan, or ii) on a Transit Priority Corridor on Schedule D of this Plan. For the purposes of this policy only, the "Transit Street" defined in the Riverside South Community Design Plan is considered	existing context and the planned function of the area. Secondary plans or zoning that currently permit building heights greater than four storeys will remain in effect. 4. Notwithstanding Policy 3 new taller buildings may be considered for sites that; a. front an Arterial Road identified on Schedules E or F of this Plan and which are: i) within 800 metres walking distance of a Rapid Transit Station on Schedule D of this Plan, or ii) on a Transit Priority Corridor on Schedule D of this Plan. For the purposes of this policy only the "Transit Street", defined in the Riverside South Community Design Plan, is considered an Arterial Road, or. b. are in an area already characterised by taller buildings or sites zoned to permit taller buildings.

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		an Arterial Road.	
		b) subject to a zoning amendment for infill up to a height that does not exceed the height permitted by adjacent existing development or planned function and where all of the following criteria are met:	
		 i) the site is within 800 metre walking distance of a Rapid Transit station or 400 metres walking distance of a Transit Priority corridor; and 	
		ii) the site is between two properties within the General Urban Area, and adjacent to or across a public street from at least one property that has existing zoning or a building that exceeds four storeys.	
		c) existing zoning that permits buildings of greater height	
R	Residentia	Il Mix in new Communities	
	2.2.2	24. For those lands outside of the Greenbelt that are included in a community design plan approved by Council after June 10, 2009, the following housing mix	24. For those lands outside of the Greenbelt that are included in a community design plan approved by Council after June 10, 2009, the following housing mix

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		and density provisions apply	and density provisions apply
		a. At least <u>45</u> per cent single detached but not more than 55 per cent single detached, at least 10 per cent apartment dwellings and the remainder multiple dwellings, other than apartments.	a. At least 30 per cent single detached but not more than 55 per cent single detached, at least 10 per cent apartment dwellings and the remainder multiple dwellings, other than apartments.
		b. Overall residential development will meet a minimum average density target of 34 units per net hectare. Net residential density is based on the area of land in exclusively residential use, including lanes and parking areas internal to developments but excluding public streets, rights- of-way and all non-residential uses.	b. Overall residential development will meet a minimum average density target of 34 units per net hectare. Net residential density is based on the area of land in exclusively residential use, including lanes and parking areas internal to developments but excluding public streets, rights-of-way and all non-residential uses.
Pa	rking Po	olicies	
83	2.3.1	Parking	Parking
		32. The City will manage the supply of parking in areas with intensification requirements and other areas served by the Rapid Transit and Transit Priority Networks to achieve the following objectives:	32. The City will manage the supply of parking in areas served by the Rapid Transit and Transit Priority Networks where intensification and density are encouraged to achieve the following objectives:
		a. To produce short-term parking that supports the needs of local businesses, residents, institutions	a. To produce short-term parking that supports the needs of local businesses, residents, institutions

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	and tourism destinations;	and tourism destinations;
	 b. To limit the supply of long-term parking in a manner that balances transit ridership objectives with the needs of automobile users; 	 b. To limit the supply of long-term parking in a manner that balances transit ridership objectives with the needs of automobile users;
	c. To support intensification and minimize the amount of land devoted to parking through measures such as providing parking underground or in structures incorporating other uses and arrangements to share parking among land users;	c. To support intensification and minimize the amount of land devoted to parking through measures such as providing parking underground or in structures incorporating other uses and arrangements to share parking among land users;
	d. To continue to regulate both the minimum and maximum parking requirements for development within 800 metres-walking distance of existing rapid transit stations and future rapid transit stations identified in an Environmental Assessment, or within 400 metres walking distance of the existing Transit Priority Network. Regulations may vary and respond to the requirements of specific sites and areas.	d. To continue to regulate both the minimum and maximum parking requirements for development within 800 metres-walking distance of existing rapid transit stations and future rapid transit stations identified in an Environmental Assessment, or within 400 metres walking distance of the existing Transit Priority Network. Regulations may vary and respond to the requirements of specific sites and areas.
	e. The City may undertake reviews of the Zoning By- law with respect to parking requirements, appropriate to implement the broader goals of this	e. The City may undertake reviews of the Zoning By- law with respect to parking requirements, appropriate to implement the broader goals of this

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		Plan.	Plan .
84	2.3.1	33. In intensification areas, on-street parking will be pursued to facilitate local shopping and economic activity through such means as reducing the number, location and width of vehicle access routes and by combining access to parking and service areas from side streets or service lanes.	33. In intensification areas, on-street parking will be pursued to facilitate local shopping and economic activity through such means as reducing the number, location and width of vehicle access routes and by combining access to parking and service areas from side streets or service lanes.
		34. In establishing requirements for on-site parking, the City will have regard to the current provision of rapid transit and transit priority measures in the area and to the potential impacts on the use of nearby roads with respect to:	34. In establishing requirements for on-site parking, the City will have regard to the current provision of rapid transit and transit priority measures in the area and to the potential impacts on the use of nearby roads with respect to:
		 a. Increases in demand for on-street parking and the adequacy of the supply; 	a. Increases in demand for on-street parking and the adequacy of the supply;
		b. The need to facilitate local shopping and economic activity; and	b. The need to facilitate local shopping and economic activity; and
		c. The ability to provide new cycling facilities as set out in the Ottawa Cycling Plan.	c. The ability to provide new cycling facilities as set out in the Ottawa Cycling Plan.
		35. In intensification target areas, the City will:	35. In intensification target areas, the City will:
		a. Establish maximum requirements for on-site	a. Establish maximum requirements for on-site

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	parking and reduce or eliminate minimum requirements;	parking and reduce or eliminate minimum requirements;
	b. Pursue on-street parking through such means as reducing the number, location and width of vehicle access routes and by combining access to parking and service areas from side streets or rear service lanes.	b. Pursue on-street parking through such means as reducing the number, location and width of vehicle access routes and by combining access to parking and service areas from side streets or rear service lanes.
	36. Outside intensification target areas, the City may establish maximum requirements for on-site parking and reduce or eliminate minimum parking requirements:	36. Outside intensification target areas, the City may establish maximum requirements for on-site parking and reduce or eliminate minimum parking requirements:
	Within 800 metres walking distance of a rapid transit station or within 400 metres walking distance of the Transit Priority Network; or	a. Within 800 metres walking distance of a rapid transit station or within 400 metres walking distance of the Transit Priority Network; or
	b. Within 400 metres walking distance of a Traditional Mainstreet where the requirement to provide parking, the small size, dimensions and other characteristics of existing lots preclude a change in use or small-scale intensification.	b. Within 400 metres walking distance of a Traditional Mainstreet where the requirement to provide parking, the small size, dimensions and other characteristics of existing lots preclude a change in use or small-scale intensification.
	37. The City will review the Zoning By-law with respect to parking requirements in different areas of Ottawa in	37. In order to achieve the parking objectives identified in policies 32-36 above the City will consider, and may

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		order to implement the policies of this Plan.	implement, parking requirements differently based on geographical location, the contextual influences, the timing of the provision of full transit service and anticipated phasing of development.
Secon	idary Pla	ins and CDPs	
123	2.5.6	 6. Community design plans and other area-specific plans will implement Council's design guidelines, and the design policies in this Plan, through provisions for development parcels within the planning area. Council's design guidelines will apply in all planning areas and will be referenced but not repeated in the plan. 7. A secondary plan to implement a community design plan is required to apply provisions for building height and density and may include other elements, such as those listed in Policy 4 above. This approach will ensure that proposed changes in the plan for individual development parcels are considered within the context of the planning area and the plan's objectives are achieved over time. 	 Secondary Plans, Community Design Plans and other secondary planning processes used to guide the development of a community, area or site should reference the design policies of this Plan and the City's design guidelines and identify their applicability in terms the of the community and area context. A secondary plan will be required where a community design plan or other secondary planning process proposes greater building heights than those permitted by the Official Plan. This approach will ensure that taller buildings are considered within the context of the plan's objectives for the area over the long-term.
124	2.5.6	A secondary plan to implement a community design plan or other secondary planning process may not be	8. A secondary plan is not required where a community design plan or other secondary planning process, that

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		 needed in the following circumstances: a. A community design plan or other area-specific plan is undertaken primarily to direct changes to the Zoning By-law if the Zoning By-law amendment is brought to City Council concurrently for approval; and b. The plan is prepared in keeping with the policies in Section 3 for Urban Expansion Study Area and Developing Communities (Expansion Area) and through this process, a secondary plan is not required. 	 conforms to the Official Plan, is undertaken to: a. direct changes to the Zoning By-law which is brought to City Council concurrently for approval; or b. the plan is prepared in keeping with the policies of either Section 3.11 Urban Expansion Study Area or 3.12 Developing Communities (Expansion Area);
127	2.5.6	12. Community design plans and other area-specific plans are implemented by the City in partnership with property owners, the community, other levels of government and other parties, using a variety of strategies shown in Figure 2.9. Each plan will include an action plan that identifies projects and priorities for all parties and that links proposed municipal actions to City work programs and budgets. A Financial Plan will show the cost of capital investments and the source of funding. Provisions for High-Rise 10-30 and High-Rise 30+	12. Community design plans and other area-specific plans will be prepared and implemented by the City in partnership with property owners, the community, other levels of government and other parties, and guided by the strategies shown in Figure 2.9. Each plan will include an action plan that identifies projects and priorities for all parties and that links proposed municipal actions to City work programs and budgets. A Financial Plan will show the cost of capital investments and the source of funding.

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		Buildings	Provisions for High-Rise and High-Rise 31+ Buildings
		 13. Secondary plans and community design plans should locate any High-rise 10-30 and High-rise 30+ buildings within proximity of a rapid transit station with the tallest buildings generally located close to the station. These buildings should be clustered with other buildings of similar height. Building heights should decline as the distance from the transit station increases and transition to surrounding areas of lower building height as per Section 4.11. 14. In areas where buildings of 31 storeys and more are permitted in a community design plan, the plan will include a public view and skyline analysis to assess the impact of potential building on significant public view corridors and skyline. Skyline refers to the complete or partial distant view o the city's tallest buildings and structures against the background of the sky. This analysis will: a. Consider any existing studies on public views and skyline; b. Identify significant public view corridors by identifying significant landmarks to which views 	 13. The City intends that the highest density of development, including High-rise buildings, locate where rapid transit is being provided. Secondary plans and community design plans should locate high-rise buildings proximate to rapid transit stations to support that objective. High-rise buildings are also a built form that requires detailed attention to urban design and their impacts on the existing communities into which they are located. Building design and appropriate transitions, such as those identified in Section 4.11, should be provided to reduce impacts on existing developed areas. 14. Where a secondary plan proposes High Rise 31+ storey buildings for a specific area the City will: a. Assess the impact of this type of development on the City's Skyline and incorporate policies to identify and protect prominent views and vistas where they are determined to exist. Skyline refers to the complete or partial distant view of the city's tallest buildings and structures against the background of the sky. This assessment will

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		shall be protected (such as Parliament Buildings, Gatineau Park, and other important national, civic and local landmarks), and significant public vantage points; and	include: i. Consideration of any existing studies on public views and skyline; and
		 c. Identify the existing skyline and determine the impact and appropriateness of the potential Highrise "B" building. 15. The City shall consider the following criteria when determining locations of High-Rise 30+ buildings during the community design planning process: 	ii. Identification of any significant public view corridors by identifying significant landmarks to which views shall be protected (such as Parliament Buildings, Gatineau Park, and other important national, civic and local landmarks), and significant public vantage points; and
		A prominent location fronting on streets, lanes, public open space and other public land preferably on three sides;	iii. Identification of the existing skyline and determine the impact and appropriateness of any proposed buildings 31 storeys or more.
		b. Potential for negative shadow or microclimate impacts;	 b. Consider the following: i. A prominent location or locations fronting on atreats large, public open space and other
		c. Provision in the plan for a mix of uses within the area or within the building;d. Conservation, retention and renovation of	streets, lanes, public open space and other public land preferably on three sides and good transportation access;
		designated heritage buildings and significant heritage resources in their entirety.	ii. Avoiding or mitigating negative shadow or microclimate impacts such as the creation of

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	e. Where a site has good transportation access, and	excessive wind and providing insufficient
	is positioned with appropriate buffers to mitigate	sunlight in adjacent public spaces;
	impact on established low rise neighbourhoods as	iii The provision of a mix of uses within the
	per Section 4.11	iii. The provision of a mix of uses within the building or the surrounding area to service
	16. The community design plan may include additional	residents or business tenants within the
	provisions to guide the review of development	building and the broader community;
	proposals for High-rise 30+ buildings, such as:	building and the broader community,
	proposals for Flight fise so F buildings, such as.	iv. Conservation, retention and renovation of
	a. The identification of priority community amenities	designated heritage buildings and significant
	and the mechanisms by which they will be	heritage resources.
	provided;	v. Building transition and the mitigation of
	b. Provision of a public institutional use;	impacts on adjacent low-rise neighbourhoods
	b. Troviolori of a public indicational aco,	through building design, massing as per
	c. How to encourage architectural excellence and	Section 4.11.
	sustainable design;	
	d. Mitigation of shadowing and microclimate impacts;	vi. The identification of priority community
	d. Willigation of orladowing and microdiffice impacts,	amenities or public institutional uses that may
	e. Other elements or considerations identified in the	be required and the mechanisms by which
	community design plan.	they will be provided.
		vii. Mechanisms to encourage architectural
		excellence and sustainable design.
		viii. Any specific requirements identified during the

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			secondary planning process.
238 M	4.1	Secondary plans, villages and urban areas and site- specific policies found in Volume 2 provide more detailed policy directions for specific areas or neighbourhoods. The policies and plans in Volume 2 must conform to the policies and plans in Volume 1 of the Plan, except where policies in Volume 1 indicate otherwise. However, the policies in Volume 2 may be more restrictive than the policies in Volume 1 of the Plan. Centres and Mainstreets	Secondary plans, for villages and urban areas and site-specific policies found in Volume 2 provide more detailed policy directions for specific areas or neighbourhoods. The policies and plans in Volume 2 must conform to the policies in Volume 1 of the Plan, except where policies in Volume 1 indicate otherwise. Secondary plans and site specific policies in Volume 2 may be more restrictive than the policies in Volume 1 of the Plan.
146	3.6.2	 3. Mixed Use Centres are priority areas for undertaking more detailed secondary planning and adopting or updating community design plans and secondary plans. These plans may: a. Provide for minimum and maximum building heights that are different from those identified in this Section; b. Allocate the minimum density required by this Plan on a site-specific basis, or increase the minimum density, such that not all sites achieve 	 3. Mixed Use Centres are priority areas for undertaking a more detailed Secondary Plans. These plans may: a. Provide for minimum and maximum building heights; b. Apply the target density for the area, identified in Figure 2.3, or require different densities to be achieved on a site-specific basis such that over time the overall target density is achieved for the area;

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	the minimum density but the required density is achieved overall in the area; c. Develop area-specific design considerations. 4. Except where a secondary plan specifies otherwise or existing zoning permits greater heights, building heights are: a. A maximum of 12 storeys, providing transition to adjacent low-rise residential in accordance with Section 4.11; b. A minimum of four storeys for residential and office development. 5. Greater building heights may be considered subject to an amendment to the secondary plan or site-specific policies in Volume 2, and must demonstrate consistency with Policy 2.2.2(17) and all other relevant policies in this Plan.	 c. Develop area-specific design considerations. 4. In order to achieve the employment targets for Mixed Use Centres and the target density within walking distance of existing and proposed stations on the City's Rapid Transit System, a range of building heights, including High-Rise may be considered. Appropriate transition in building height is to be provide at the periphery where the Mixed Use Centre abuts established Low-Rise or Mid-Rise areas.
158 3.6	2. The symbol delineating Traditional and Arterial Mainstreet designations on Schedule B of this Plan is a stand-alone land use designation and not an overlay. The Traditional and Arterial Mainstreet	The symbol delineating Traditional and Arterial Mainstreet designations on Schedule B of this Plan is a stand-alone land use designation and not an overlay. The Traditional and Arterial Mainstreet

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		designations generally apply to the whole of those properties fronting on the road to a maximum depth of 200 metres, for very deep lots. However, the boundary is flexible depending on site circumstance and lot configuration. For instance, it may also include properties on abutting side streets that exist within the same corridor. A secondary plan may specify a greater or lesser depth.	designations generally apply to the whole of those properties fronting on the road, however, for very deep lots the designation will generally be limited to a depth of 200 metres from a Traditional Mainstreet and to a depth of 400m from an Arterial Mainstreet. The boundary may also be varied depending on site circumstance and lot configuration. For instance, it may also include properties on abutting side streets that exist within the same corridor. A secondary plan may specify a greater or lesser depth.
161	3.6.3	11. This Plan supports mid-rise building heights up to six storeys on Traditional Mainstreets, unless a secondary plan states otherwise. Building heights greater than those specified in this Section will only be permitted through a Secondary Plan. The Zoning By-law may establish building heights lower than six storeys based on site conditions, existing character and compatibility. The Zoning By-law will establish a minimum building height equivalent to a two-storey building, except for those existing gas bars, service stations, automobile sales and drive-through facilities identified in Policy 8 above.	11. This Plan supports Mid-Rise building heights on Traditional Mainstreets but secondary plans may identify circumstances where different building heights may be permitted. In the absence of a Secondary Plan the Zoning By-law may establish as-of-right building heights lower than those permitted above based on site conditions, existing character and compatibility. The Zoning By-law will establish a minimum building height equivalent to a two-storey building, except for those existing gas bars, service stations, automobile sales and drive-through facilities identified in Policy 8 above.

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