



Rawlson King

**Councillor / Conseiller,
Rideau-Rockcliffe**

**Policy Position on New Official Plan-
Growth Management Strategy**

No Expansion of the Urban Boundary

I do not support expansion of the urban boundary for the City of Ottawa and disagree with the staff recommendation to expand. However, I recognize that taking this position will result in more development within already defined urban lands, including within Ward 13, Rideau-Rockcliffe. It is my view that intensification is necessary for the health, viability and longevity of our City. This intensification however must be undertaken in a fashion that is thoughtful and produces an ideal mix of housing and healthy communities, while safeguarding the environment and protecting greenspace.

Context

It is important to understand the parameters under which the City is required to operate. The responsibility for long-term planning in Ontario is shared between the province and municipalities. The province sets the ground rules and directions for land use planning through the Planning Act and the Provincial Policy Statement (PPS). Municipalities and planning boards implement the province's land use planning policy framework.

Sometimes residents argue that the City alone is driving intensification to expand its tax revenue. The reality however is that the PPS requires municipalities to make land available for intensification and redevelopment. Intensification is therefore mandated, and the province expects the City to apply appropriate development standards to promote and facilitate intensification, redevelopment and compact form in established built-up neighbourhoods, while avoiding or mitigating risks to public health and safety.

This year, with Ottawa's population surpassing a million people, it will be very important to ensure that the City's growth remains sustainable. A key to achieving long-term sustainability in development is intensification. Under the PPS, all Ontario municipalities must have an Official Plan in place, for which the planning period has been extended to 25 years. Municipalities and planning boards prepare Official Plans and make land use planning decisions to achieve their communities' economic, social and environmental objectives, while implementing the provincial policy direction. Municipal decisions must be "consistent with" the Policy Statement by law, meaning that they must achieve the province's policy direction.

The next Official Plan will forecast City development until 2046. Currently, as part of the Official Plan process, City staff is seeking the approval of a Growth Management Strategy that will determine the next Official Plan's urban boundary to accommodate growth. The Official Plan is a once-in-decade chance to influence the direction of our city as it is Ottawa's land-use blueprint.

It is important to note that City Council's own approved policy directions to staff last year agreed with demographic projections of growth of about 400,000 people in this timeframe, with the assumption that those new residents will require 195,000 new places to live.

The staff report presented to the Joint Planning and Agricultural and Rural Affairs Committee meeting on May 11, 12 and 19 recommended expansion of the urban boundary, entitled the "balanced scenario", which would see the addition of between 1,350 to 1,650 greenfield hectares of land to the urban boundary. The staff recommendation for additional land is predicated on the projection that the City will run out of developable land within the urban boundary by around 2036 and that expansion is necessary to accommodate Ottawa's projected 400,000 additional residents.

In this context, it is important to properly articulate what land the urban boundary encompasses. Often during this discussion, arguments such as “not everyone wants to live downtown” are used, as if the urban boundary only entails the 10 kilometre radius around Parliament Hill. This is erroneous since the urban boundary currently includes Orleans, Stittsville, Kanata and Barrhaven – suburban areas where the commute time to downtown by public transport is already an hour and a half from the furthest point. It is also important to note that there is already vacant land within the urban boundary which was previously approved for residential development that still remains undeveloped – indeed a quarter of the lots allocated in the 2009 Official Plan have not be developed.

It is also important to note that the staff report provided to the joint committee did not outline any geographical details concerning where the proposed 1,281 greenfield hectares for new residential development, or remaining hectares for commercial development, would be sited.

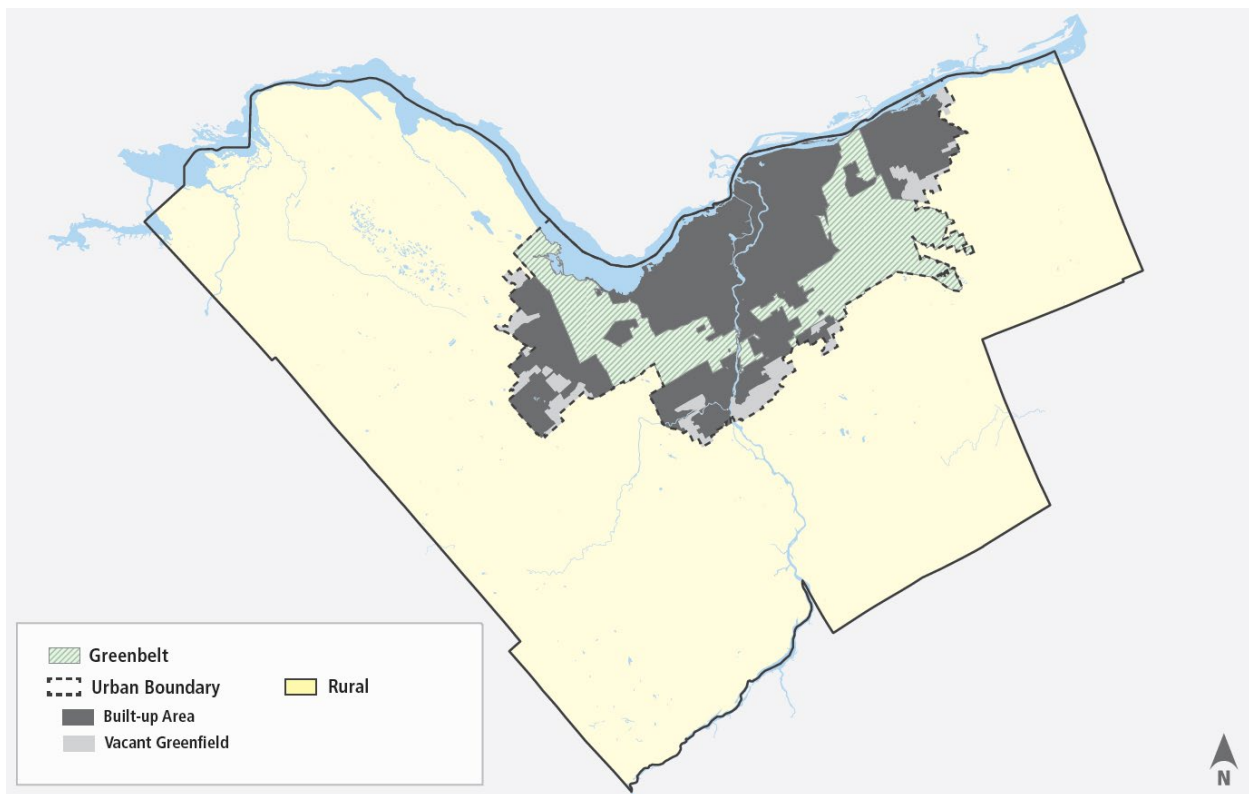


Figure 1 Map of the Urban Boundary from the [Residential Growth Management Strategy for the New Official Plan](#)

Environmental impacts

Loss of land, greenspace and an increased need for more roads and more sewer and watermain infrastructure is indicative of urban sprawl, which is irreversibly destructive to the environment. Clearing greenfield for development results in a devastating loss of tree canopy and increases catastrophic risks, including increased frequency of extreme flooding. Consequently, I support the “no expansion” scenario because in the context of a climate emergency, which City Council declared last year, I cannot in good conscience agree with the addition of more greenfield lands for development.

While the staff report asserts that the balanced scenario is not “sprawl”, the report itself does not define sprawl as a concept. A broad definition of sprawl in the North American context, is typically defined by lower density, automobile dependence, and largely monotonous development on the periphery of an urban area.¹ The assumption that new suburban communities in Ottawa will not constitute urban sprawl because of their higher density and proximity to transit is inaccurate. By definition, the addition of more lands to the periphery of the current urban boundary will create more car dependency, which based upon the fundamental law of congestion along with induced demand will lead to widened and extended road infrastructure, and more traffic congestion that ultimately will beget more urban sprawl.²

Despite the staff report recommending that transit infrastructure be implemented at the same time as new developments are built, it is unlikely that this will occur. Despite the proposed scoring, which will award more points to the lands most proximate to rapid transit in future plans, I am skeptical that transit connections will be completed for wholesale adoption and consumption by new suburbanites at the outset. Residents move into neighbourhoods expecting completed infrastructure, not just a house on a lot. Consequently, the staff report is aspirational but inaccurate.

15-Minute Neighbourhoods, Infrastructure and Thoughtful Design

One of Council’s policy directions to City staff in December 2019 was that “15-minute neighbourhoods” be established to eliminate car dependency and promote social and physical health. A 15-minute neighbourhood is one with a diverse mix of land uses, including a range of housing, shops, services, local access to food, schools, employment, greenspaces and pathways.³ Such neighbourhoods should have enough close amenities as to be inheritably walkable. If Ottawa was comprised of a network of 15-minute neighbourhoods, the City could realistically achieve its aspiration of becoming North America’s most livable mid-sized City.

The expansion of the urban boundary however will not contribute to this objective because urban sprawl is not compatible with walkable neighbourhoods. Walkable blocks and streets within the urban core of historic cities and towns are clearly distinct from sprawl. New suburban developments are defined by separated land uses, subdivisions and commercial developments branching off of arterial roads.⁴

Movement towards “15-minute neighbourhoods” can only occur if a wholesale assessment of Ottawa’s current neighbourhood patterns is undertaken. A full assessment would allow us to examine all local communities to identify gaps that inhibit 15-minute neighbourhoods within existing communities.

¹ Wilson, B. & Chakraborty, A., 2013, “*The Environmental Impacts of Sprawl: Emergent Themes from the Past Decade of Planning Research*”, Sustainability, p. 4, <https://www.mdpi.com/2071-1050/5/8/3302/pdf> (accessed 7 May 2020)

² Duranton, Gilles, & Turner, Matthew A., 2011. “*The Fundamental Law of Road Congestion: Evidence from US Cities*”, American Economic Review, 101 (6): 2616-52.

³ City of Ottawa, “*Official Plan 5 Big Moves*”, 2019, p. 16, <https://engage.ottawa.ca/8204/documents/18759> (accessed 7 May 2020)

⁴ Steuteville, Robert, 2018, “*How sprawl makes walkable places less affordable*”, Public Square, <https://www.cnu.org/publicsquare/2018/06/20/how-sprawl-makes-walkable-places-less-affordable> (accessed 21 May 2020)

Residents are often excited by such exercises because they allow for proper evaluation of City services in preparation for intensification. One of the staff conclusions that resulted in the recommendation for the “balanced scenario” assumes that a high level of community resistance against intensification exists. I understand that City staff might be skeptical of residents’ acceptance of increased intensification, but I believe that interpretation of resident reluctance as refusal is in error, since most resident opposition towards intensification, specifically infill development, is nuanced. The residents and community associations I speak with agree with the concept of “appropriate intensification” in order to restrain urban boundary expansion, but they assert that such development must be complimentary to the existing community’s character, infrastructure, and in proximity to services and to improved transit. Residents note that they are not against rapid intensification, but are against intensification that does not improve their quality of life.

As an example, a recent proposed development within Ward 13 will see the demolition of two single family homes to be replaced by a 35-unit low rise apartment building with seven parking spaces. It was met with a lot of objection by residents and it is these objections that staff are referring to when they do not believe there is acceptance for intensification. I heard all the objections to the development, but the loudest criticism centred around two key issues: the design of the building and whether its built form was appropriate for the street.⁵ It is easy to dismiss these concerns as NIMBYism, however, if we examine those two concerns, we will see that residents are founded in their opposition.

The design opposition to the building came down to the fact that proposed design did not lend anything to the street. The proposed design is an “anonymous box”, does not compliment the rhythm or built volumes along the street and does not provide any way for the residents to interact with the street. If we build more such buildings along a street, that street will become lifeless and unanimated. We can dismiss these concerns all we like, but it is a human reaction to want functionality. As a streetscape consideration, what the building contributes to the street is critical.

In relation to the built form, residents were concerned about the additional vehicles on the street because the building had limited parking for the proposed number of units. Residents agreed about the number of parking spaces. What they objected to was that the incentive to eliminate the need for a personal vehicle was not high enough. The street does not have sidewalks and the right-of-way is limited. Like many streets in this area east of the Rideau River, the streets are narrow, and only get narrower throughout the winter with snowbanks. Although the development will be within a five-minute walk from two different bus routes, residents were concerned that there was not enough incentive to reduce car dependency because, without sidewalks, the fundamental piece of infrastructure to support a walkable neighbourhood is not available. I agree with Ward 13 residents that a safe, walkable neighbourhood needs that infrastructure to support it.

A walkable neighbourhood is as much about the journey as it is about being able to walk. A route that only takes you directly from home to work each day is not the walkable experience residents envision when talking about the “15-minute neighbourhood”. It also includes shops, trees, cafes, amenities and meaningful greenspace. It includes social spaces that animate facades and enhance streetscapes and the public realm. In other words, walkability is a key thread to our community fabric. The built form and

⁵ King, Rawlson, 2020, “Comments on Columbus Development”, https://www.rideau-rockcliffe.ca/comments_to_planner_261_and_265_columbus (accessed 21 May 2020)

design of buildings are two critical components that contribute to a “walkable street” and so resident concerns surrounding walkability does not equate to objection towards densification, but indicates support for the necessary infrastructure to support rapid intensification.

Building “15-minute neighbourhoods” will require larger investments in a variety of hard and soft infrastructure, which can be accomplished if development charges are applied equitably to the areas experiencing the most intensification. Council must agree that neighbourhoods within the urban boundary that are set to receive density should also receive the requisite funding for active transportation (walking and biking infrastructure), as well as for social infrastructure in the form of social services, recreational and educational facilities. Council must then advocate for meaningful changes to the municipal financing model by the Province in order to accommodate forecasted intensification under any urban expansion scenario.⁶

Heritage

Ward 13 has two large Heritage Conservation Districts, both of which are unique and critical to the City of Ottawa. I personally believe that the distinctiveness and defining character of the Rockcliffe Park Heritage Conservation District and the New Edinburgh Heritage Conservation District must be protected. The Rockcliffe Park Heritage Conservation District is especially unique, since it is acknowledged as the only previous self-governing district in North America that is not only defined by its built heritage, but equally by the unifying character of its unique picturesque landscape, which creates a special sense of place. Protection of both these heritage areas is sacrosanct, because if built heritage in these districts are lost, they can never be reclaimed. Built heritage includes individual buildings such as houses or schools as well as parks, historic areas and cultural landscapes.

My view is that in areas immediately adjacent to heritage districts, there must be careful, road-by-road consideration given to the streetscape. In the same way that locating a large building with no parking on a street without sidewalks is inappropriate, locating a huge building next to a small historical home is also not appropriate. Safeguarding our City’s Heritage Conservation Districts by ensuring zoning makes the “proposed built form” appropriate for the street is one way that we can densify while concurrently protecting heritage. A good example would be mandating through zoning a gentle rise in the height of buildings away from the heritage conservation districts along gateway streets leading into heritage areas.

⁶ Rosaline J. Hill Architect Inc., February 2020. *“A Study of Neighbourhood Development Patterns in Rideau-Rockcliffe, Ottawa and the potential impact of the New Official Plan and R4 Zoning.”*

Affordability

There is no definition of affordability in the staff report, despite references to the concept. On day two of joint committee discussions, affordability was mentioned more times than any other concept. Developers argued that because land prices have tripled, the only way to build affordable homes for purchase is to expand the boundary in order to increase supply and reduce land costs.

While the price of a home is important, it is not the only cost factor. The notion of affordability must be understood to mean several things. The price of a house (either to buy or rent) is what most people understand it to mean. Just in that area, there is a difference between what is affordable to residents in the open market and what needs to be subsidized for households with deeper affordability challenges. The cost of transportation is added to this, as it is a fixed cost for family budgets.

Previous studies have acknowledged that the main cause of sprawl is prices, which have a profound impact on the decisions of companies and individuals, including decisions about where to build new developments and established businesses and where to buy houses. Currently, price structures encourage sprawl and as long as prices pull new development toward city fringes. But people make decisions based on costs and home prices are a key driver of sprawl, which is understandable: people like what they perceive as a low price. While it is true that some prices that encourage sprawl are market-driven, many others are the direct result of past government decisions on regulation and budgets.⁷

Markets exist within the framework of government policy and are heavily influenced by it. But markets can be distorted by government policies. For example, the publicly-built, free-use road networks brought suburban development to greenfield areas and created the current market in suburban housing. That market is propped up by ongoing spending on road maintenance, repair, replacement, expansion, clearing, lighting, policing, emergency medical services and other costs.⁸

But the ongoing failure to internalize the externalities of road use such as illness, injuries, and climate change amounts to a subsidy to automobile use that makes suburban sprawl possible. Without these subsidies, the price of transportation to and from suburban locations would be much higher, and today's suburban housing market would not exist. Undercharging developers for other municipal costs of their new greenfield developments provides further subsidies that artificially distort the market in favour of sprawling development. Utility pricing that fails to reflect the higher costs of servicing sprawling areas is another subsidy.⁹

⁷ Sustainable Prosperity Institute, *"Suburban Sprawl: Exposing Hidden Costs, Identifying Innovation Summary"*, October 2013, p. 2, https://institute.smartprosperity.ca/sites/default/files/publications/files/Summary%20for%20General%20Audiences_0.pdf (accessed 21 May 2020).

⁸ Sustainable Prosperity Institute, *"Suburban Sprawl: Exposing Hidden Costs, Identifying Innovation Summary"*, October 2013, p. 3, https://institute.smartprosperity.ca/sites/default/files/publications/files/Summary%20for%20General%20Audiences_0.pdf (accessed 21 May 2020).

⁹ Sustainable Prosperity Institute, *"Suburban Sprawl: Exposing Hidden Costs, Identifying Innovation Summary"*, October 2013, p. 3, https://institute.smartprosperity.ca/sites/default/files/publications/files/Summary%20for%20General%20Audiences_0.pdf (accessed 21 May 2020).

The “15-minute neighbourhood” by design contributes further to affordability by ameliorating transportation costs. If the majority of tasks can be completed in the neighbourhood, it negates the requirement for a private motor vehicle, which usually constitutes the largest expense for the average Canadian family.¹⁰ As previously mentioned, the “15-minute neighbourhood” is unachievable with new construction, as it requires transit, services and retail to all be complete and ready concurrently. It is, however, achievable through infill intensification.

Affordability is often thought of as meaning access to social housing, but it also means housing which is appropriate for different stages of life from students, new graduates, young couples and families, large families, singles, renters, seniors and new immigrants. The very same people who will be pushed to the outskirts in an affordability crisis are those who make our City function. More suburban development will only erode the quality of life for these people who will have to spend more time commuting.

The discussion concerning the urban boundary expansion has been centred largely around the purchase of a home, driven in part by the strong influence of developers in the conversation. Historically Canada has a very high rate of home ownership compared to other countries throughout the OECD.¹¹ But there is evidence that home ownership is in decline¹² and increasingly home affordability cannot be addressed through ownership. Many new Canadians and young people are renters and where they choose to live is often based on price but also on proximity to transit to reduce other costs and minimize commuting time. A comprehensive and unbiased real estate report should have accompanied the staff report to provide Councillors a clearer picture of what the home ownership and rental requirements into 2046 would be, based on current projections. Councillors should also be provided with independent figures to determine how the “no expansion” scenario would impact housing costs.

Affordability can also be measured in lost time and opportunity costs. When LRT was launched and increasing delays and frustrations from changed bus routes and longer commutes emerged, there were many reports in local papers of residents consciously making the choice to utilize their vehicles so that they could be guaranteed some semblance of being able to be home with their children or not late for daycare pick up. We cannot blame people not wanting to miss out on precious time with their families.

The list of people waiting for social housing in Ottawa is growing every year, and while this staff report has centred around private dwellings, those seeking affordable housing in our City are as critically important. I was proud to support the housing emergency declaration earlier this year and in this vein it is contingent upon City Council to consider how we house everybody in our City, not just those who can afford to purchase or rent a home. Best practice for social housing now shows us that the large-scale concentration of low-incomes residents produces several public safety issues and requires intense investments in those high-needs neighbourhoods.

¹⁰ Statistics Canada, “Detailed household final consumption expenditure, Canada, quarterly (x 1,000,000)” Table 36-10-0124-01, <https://doi.org/10.25318/3610012401-eng> (accessed 14 May 2020)

¹¹ Andrews, Dan and A. Caldera Sánchez (2011), “The Evolution of Homeownership Rates in Selected OECD Countries: Demographic and Public Policy Influences”, OECD Journal: Economic Studies, Vol. 2011/1. http://dx.doi.org/10.1787/eco_studies-2011-5kg0vswqpmg2 (accessed 13 May 2020)

¹² Statistics Canada, “Housing in Canada: Results from the 2016 Census”, 25 October 2017, <https://www150.statcan.gc.ca/n1/daily-quotidien/171025/dq171025c-eng.htm?CMP=mstatcan>, (accessed 14 May 2020)

Pockets of inclusionary zoning throughout the City, especially in transit-oriented development, must happen if we are to encourage healthy communities. For these reasons, I am excited concerning my direction to City staff to undertake a visioning exercise for the lands surrounding the Ottawa Baseball Stadium on Coventry Road. Future high-density development at that site, which lies within the urban boundary, would be appropriate since the stadium is the only sports facility in the City situated adjacent to mass transit, inter-city rail, a hotel, and the city wide cycling network, along with freeway and major arterial access. With easy access to Tremblay LRT via with a covered walkway, this 19-acre site could provide a wonderful opportunity to locate affordable housing on the adjacent site, along with other mixed-uses, including multi-family housing through a mix of rentals and properties, coupled with retail and other community amenities.

Equity and Inclusion

The consultation for the new Official Plan has largely been conducted through after-hours meetings in community centres and, since the advent of the pandemic, through online consultation. Both are very traditional ways of doing consultation. For several reasons, this kind of consultation often excludes people with low-income, women, people of colour and other equity-seeking groups. These are usually the same groups who are most affected by planning and zoning decisions. The necessity of applying a gender and equity lens to planning may not be immediately apparent to everyone. However, let us consider access to public transit through an equity lens. Low income families, less likely to have access to private transportation, may rely on proximity to public transit or safe active transportation options more heavily, as this may be their primary method of accessing employment, childcare, schools, grocery stores, or health appointments. Equity advocates have also noted that women are more likely to make multiple stops on their commute, thereby benefiting more from better inclusive transportation infrastructure such as wider sidewalks and separated bike lanes.¹³

The COVID-19 public health crisis has also demonstrated that the number one issue faced by high-need groups over the last few months has been food security. Food bank use in Ward 13, which was already the highest in the Province¹⁴, has increased in the last few months by estimated 30 to 50 percent. Concerns about food security have been voiced throughout Ottawa at large by the Coalition of Health and Resource Centres. Emergency food provision is not the only facet of food security. Nothing is more fundamental than what we eat and to support that, we need to support farmers. For this reason, I am supportive of the motion by Councillors Moffatt and El-Chantiry to prohibit the expansion of the urban boundary into agricultural land, which will preserve Ottawa's farms and have a positive impact on local food security and sustainability.

¹³ City for All Women Initiative, "Growth Management Strategy: Intersectional Equity and Inclusion Analysis", May 2020, p. 4, <https://www.cawi-ivtf.org/sites/default/files/news/growth-management-strategy-intersectional-analysis.pdf> (accessed 6 May 2020).

¹⁴ Feed Ontario, "Food Bank Use by Provincial Electoral Riding 2018", <https://feedontario.ca/report-hunger-map/>, (accessed 7 May 2020).

The other issue that has been increasingly highlighted by the pandemic is how much of a privilege access to greenspace, especially private greenspace, is, and how important this access is for mental and physical health. This is another reason to preserve our environment and thoughtfully intensify around existing park and recreation facilities within the established urban boundary, while giving primary concern to landscaping and the use of space when considering potential development.

Fiscal implications of expansion

The staff report lacks a cost comparison between any of the scenarios proposed and does not contain a comprehensive cost benefit analysis or an impact analysis on the City's long-term financial plan. This is problematic because Council cannot make an informed decision without understanding the fiscal implications of each scenario.

While I support wholesale infrastructure investment to support urban intensification, it must be noted that building sprawl has been historically more expensive and entails the ongoing maintenance of new and expanded roads, water and sewage infrastructure.

Previous studies have demonstrated that Canadian municipalities can achieve a tremendous amount of tax savings by increasing the number of new dwellings sited in the urban core, along with reducing capital costs through adopting denser growth patterns in existing urban boundaries.¹⁵

Suburban sprawl comes at a price for the people who live in the suburbs, and includes high transport costs, long commutes and increased air pollution. Some of the costs lead to increased property and income taxes and long-term government liabilities that citizens eventually pay for. Others are hidden in climate change and habitat loss that negatively impact public health and quality of life.¹⁶

In brief, without complete data about the costs of building and maintaining proposed new greenfield infrastructure versus upgrading and replacing what we already have (growth versus renewal), I cannot support the "balanced scenario". I do not think it is unreasonable to expect that quality data be provided to aid and support Council's decision-making process.

¹⁵ Sustainable Prosperity Institute, "Suburban Sprawl: Exposing Hidden Costs, Identifying Innovation Summary", October 2013, p. 2, https://institute.smartprosperity.ca/sites/default/files/publications/files/Summary%20for%20General%20Audiences_0.pdf (accessed 21 May 2020).

¹⁶ Sustainable Prosperity Institute, "Suburban Sprawl: Exposing Hidden Costs, Identifying Innovation Summary", October 2013, p. 2, https://institute.smartprosperity.ca/sites/default/files/publications/files/Summary%20for%20General%20Audiences_0.pdf (accessed 21 May 2020).

Challenging assumptions

While I do not dispute the growth projections made by staff, as these were ultimately approved by Council, I do question some of the assumptions made throughout the report. For example, the Residential Growth Management Strategy states that *“The No Expansion scenario has an inherent risk: there will be an inadequate supply of housing if the required complete housing range of additional intensification is not achieved.”* The calculation of risk is based on the calculation of units required and critically, the kind of housing mix which assumes that 34 percent (or 66,100) of new units need to be single detached. If we re-balanced the calculation to assume a higher level of semi-detached units (up from three percent to a modest 10 percent) that would save more land, and thus produce a different type of calculation for land needed to meet the housing mix.

There was a lot of conversation on the second day about real estate data and the assertion from many in the development industry that we must build single family homes due to market demand. We can all understand the desire to have greenspace, but greenspace does not have to be synonymous with a single-family home. I applaud the design concepts that staff have provided in the report for “613 Flats” and hope that we can incentivize building that type of infill development topology within the urban boundary, especially when master planning new social housing renewal projects in Ward 13 to make more efficient use of existing land, while importantly provide new options for affordable housing to address the missing middle. Building “missing middle” housing typologies, which include row houses to mid-rise apartments, will help to increase affordability by providing new ownership and rental opportunities. And building more densely, particularly in established neighbourhoods, will also contribute to the sustainability of cities, by putting people within walking and cycling distance from workplaces, schools and other day-to-day needs.¹⁷

Conclusion

I believe that Ottawa is a wonderful city which can only be further enhanced if my colleagues and I are brave enough to make tough decisions. Many residents have written to me asking me to hold the line against expansion. Holding the line on urban boundary expansion is not the easy choice. But I firmly believe that for the viability and future of our City, we cannot afford to allow the City to physically expand beyond its current boundaries.

In conclusion, I will not be supporting urban boundary expansion because the report does not address affordability, provides no analysis on long-range financial planning for the City and does not map out what intensification will look like in terms of identifying candidate parcels of land for expansion. If history is any guide, urban expansion will lead to raised taxes, an increase of single-family homes across large tract areas which increase environmental impact from car-dependent transport and increased environmental risks, including pollution and recurrent floods.

Rawlson King

City Councillor, Rideau-Rockcliffe (Ward 13)

May 21, 2020

¹⁷ Lam, Elsa. “Finding the Missing Middle”, Canadian Architect, 5 September 2019, <https://www.canadianarchitect.com/editorial-finding-the-missing-middle/> (accessed 21 May 2020).

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