

**RE: Opinion, 2 The Parkway
Zoning Bylaw Amendment Proposal
File: D02-02-11-0101 (City of Ottawa).**

Prepared for

**Kanata Beaverbrook Community Association Inc.
Kanata, Ontario**

FINAL REPORT

**Prepared by
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Part A. Specifics of the Assignment.

1. With regard to 2 The Parkway, Zoning Bylaw Amendment Proposal, File: D02- 02-11-0101 (City of Ottawa), I was provided a body of documentation by the Kanata Beaverbrook Community Association (KBCA) Inc. and asked to provide an opinion as to

“Whether the proposal represented good planning and, within the limits of the time budget and financial resources available to me, to inform the client (Kanata Beaverbrook Community Association Inc.) of the strengths and weaknesses of the proposal in regard to pertinent planning principles and good planning practices.”

2. In addition to the provided documentation, I obtained additional documentation to assist in my deliberations. The examined documentation is listed in Appendix A.

Part B. Findings in Regard to the Appropriateness or Inappropriateness of the Existing Zoning (IA1) of the Subject Site, 2 The Parkway.

3. Due to the limited amount of time available to meet with the client, assemble and analyse documentation, generate findings, and write my opinion, findings are presented at the outset of the opinion statement to ensure that they are included before time “runs out”, and the derivations of the findings are elaborated as time permits within the report, and can be further elaborated upon instruction by the KBCA through presentation(s) to Planning Committee or in other venue(s). I note that some findings as to the appropriateness or inappropriateness of the existing zoning (IA1) of the subject site, 2 The Parkway, also appear in Part C (Results of a Search to Locate Evidence Which Supports the Proposed Amendment Regardless of the Findings in Part B) for comparative analysis purposes.

4. It is my finding that no pertinent planning evidence has been provided to me or been obtained by me which demonstrates that the current zoning (IA1) of the subject site is inappropriate.

5. It is my finding that no substantive planning-related question(s), issues), or challenge(s) have been raised as to the inappropriateness of the current zoning (IA1) of the subject site.

6. It is my finding that no substantive planning-related question(s), issues), or challenge(s) have been raised as to a surplus of land zoned IA1 in the Beaverbrook neighbourhood.

7. It is my finding that no substantive planning-related question(s), issues), or challenge(s) have been raised as to an excess amount of land zoned IA1 in the Beaverbrook neighbourhood.

8. It is my finding that the subject land is in fact the only currently-zoned IA1 property in the Beaverbrook neighbourhood which is available for re-use as an institutional development.

9. It is my finding that there are few if any non-IA1 properties/locations in the Beaverbrook neighbourhood that readily lend themselves for good planning reasons to a change from its/their current zoning to IA1 zoning.

10. I was unable to locate any official (municipal government, court) documentation which establishes that even a single complaint has been made in recent years by a member of the public, or a neighbourhood association, or other public interest group, to the effect that the IA1 zoning of 2 The Parkway was permitting a nuisance use or any other deleterious use of property that negatively affected adjoining property values, neighbourhood quality of life, etc. Further, in consultation with a selection of long-term area residents who have been involved in community matters through the KBCA and other organizations, I was unable to locate anyone who had ever heard of the existence of a filed complaint to the former City of Kanata that 2 The Parkway suffered from an inappropriate zoning designation of IA1.

11. Examination of unofficial material such as the responses to “Resident Comments to the City of Ottawa, Re: 2 The Parkway, Zoning Bylaw Amendment Proposal, File: D02-02-11-0101” did not yield any evidence to establish that the current zoning of IA1 is not consistent with the values and attitudes of current area residents, nor was I able to ascertain that changes in residents’ values and attitudes of a planning and development nature had ever arisen which challenged or even questioned whether IA1 was the proper

zoning for 2 The Parkway over the approximately 40 years that the property has been so designated.

12. I did not locate any evidence which establishes that the Official Plan and sub-plans are designed to ensure that sufficient IA1 land will be available to come on stream over the next 10-15 years, or even in the next several years, as changing demographics and increased development of Kanata and its environs put pressure on institutional facilities and services in the Beaverbrook neighbourhood and other Kanata neighbourhoods.

13. It is my finding that an excellent balance among land uses has been in play in the Beaverbrook area for four decades, I did not locate any evidence in the application which establishes that this balance will be retained with the loss of a critical part of the institutional component, nor did I encounter any indication of an appreciation of this balance, and how difficult it is to regain once it has been disrupted or lost.

14. In regard to the demand or burden which the IA1 zoning of 2 The Parkway puts on infrastructure (water and sewage, transit, parks, etc.,) in the Beaverbrook neighbourhood, adjacent neighbourhoods, or on the wider area's infrastructure networks, I did not encounter any evidence which establishes that the IA1 zoning is inappropriate for this site.

15. It is therefore my finding that, overall, IA1 is more than just an appropriate zoning designation for 2 The Parkway. That is, in my professional opinion, the IA1 designation is consistent with the planning principle of highest and best use of the subject site.

16. As a consequence of paragraphs 4-15, it is therefore my summary finding that good planning reasons accompanied by substantive evidence to justify any kind of rezoning of 2 The Parkway have not been identified in any of the documentation associated with Zoning Bylaw Amendment Proposal, File: D02- 02-11-0101 (City of Ottawa).

17. Further, and flowing from paragraph 16 and the summary finding, it is therefore my professional opinion that the proposal does not represent good planning.

18. As to the second part of my assignment (in italics for convenience), paragraphs 4-15 identify the weaknesses which in my professional opinion are inherent in the proposed change to the current zoning (IA1) of the property known as 2 The Parkway.

“Whether the proposal represented good planning and, within the limits of the time budget and financial resources available to me, to inform the client (Kanata Beaverbrook Community Association Inc.) of the strengths and weaknesses of the proposal in regard to pertinent planning principles and good planning practices.”

19. In terms of informing the community about the weaknesses in the proposal, it is my professional opinion that any one of paragraphs 4-15 is grounds for objecting to the proposal on the basis that it does not represent good planning.

20. Further in regard to the second part of my assignment, consideration was given to the matter of identifying strengths in the proposal that apply to the non-appropriateness of the existing IA1 zoning designation for 2 The Parkway. On this matter I encountered expressions of concern/opinion by the rezoning applicant that the IA1 zoning of 2 The Parkway is wanting or is no longer as appropriate as it may have been at one time.

21. Given the objective of the proposal – to achieve a rezoning – it is expected that the application will make reference to a perceived or deemed shortcoming of the zoning (IA1) that is currently in place. However, I did not encounter evidence in the application to support that perceived or deemed shortcoming. The associated finding, therefore, is that since I did not encounter any evidence-supported claims or assertions that could be construed as planning-related strengths in the documentation, I am unable to inform the KBCA as to any planning-related strength in the proposal that addresses in a non-trivial way the appropriateness or inappropriateness of the current IA1 zoning of 2 The Parkway.

22. Finally, with regard to Part B of my opinion, I reviewed the “supplementary materials” submitted as part of the application. The review of these materials did not uncover any evidence that causes me to change any of the preceding paragraphs or, to re-phrase, the examination of the supplementary materials did not yield any planning evidence which substantively challenges or discounts the appropriateness of the IA1 zoning which currently applies to 2 The Parkway.

23. As a result, on the matter of the proposal’s planning strengths and weaknesses, it is my finding that the full body of documentation submitted in support of Zoning Bylaw Amendment Proposal, File: D02- 02-11-0101 (City of Ottawa) fails to establish that the current zoning of 2 The Parkway represents bad planning, or that rezoning 2 The Parkway from IA1 to R5 would represent better planning, which leads to my professional opinion that

the proposal is a spot (re-)zoning initiative for which a good planning argument supported by pertinent evidence is not presented.

Part C. Results of a Search to Locate Evidence Which Supports the Proposed Amendment Regardless of the Findings in Part B.

24. It is my professional opinion that a seemingly complete and total failure to address the appropriateness/inappropriateness of the current zoning on the subject site is sufficient to dismiss the proposal as not achieving a critical step early on in the zoning amendment process. However, under the terms of the agreement with the client (KBCA), I am obliged to examine the proposal for the purpose of ascertaining whether, for one or more planning reasons, the proposal and associated documentation contain a public benefit or public benefits that the KBCA would want to be informed about when making a decision to support or object to the proposed zoning bylaw amendment.

25. It may be instructive to recall and emphasize at this point that the application seeks to achieve a change in the zoning of 2 The Parkway from institutional to high-rise residential. As a result, the onus is on the proponent of the proposal to establish through methodologically-derived evidence that there are good planning reasons for removing the institutional designation, which I believe meets the highest and best use standard, and replacing that designation in favour of a high-rise residential designation (R5). Moreover, for the information of the KBCA and its members, I wish to emphasize that just because a proposal represents good planning, that rationale is not a sufficient reason on its own to justify a rezoning amendment. In brief, it can be argued by way of illustration that if the present zoning of a site can be demonstrated to represent highest and best use, then merely achieving the level of good planning for a less than highest and best use alternative should not be regarded as a sufficiently compelling reason to achieve a change in a zoning designation.

26. In the remainder of Part C, my focus is on the relationship between elements of the proposal (and associated documentation) and elements of the Official Plan (OP) which gives direction to zoning bylaws, which in turn are a major, operational means of achieving the goals, objectives, etc., of the Official Plan (OP). The planning test in this regard is whether the evidence given is sufficient to establish that the proposed rezoning of 2 The Parkway satisfies the direction(s) given by the Official Plan or, to re-phrase, whether the evidence given in support of the proposed rezoning of 2 The Parkway establishes that the proposal complies with the Official Plan (OP). Then, and

as per paragraph 26, if compliance with the OP is demonstrated, attention can be turned to ascertaining whether the reason or reasons given in support of the proposed amendment is or are compelling.

27. Where appropriate I refer to elements of the Provincial Policy Statement (PPS). I emphasize that it is relatively easy and seemingly commonplace to “lard” planning and zoning applications with irrelevant or gratuitous references to the Provincial Policy Statement (PPS). As a result, my attention is limited to opinions that specifically associate sections of the PPS to the matter of rezoning, and to the analysis of planning principle-related and planning practice-related evidence presented in the documentation to justify a purported finding or an opinion.

28. Re OP Policy 2.2.3.3(a). With regard to the matter of directing growth in such a way as to achieve good planning, OP Policy 2.2.3.3(a) sets an upper limit of 600 metres as the distance between a new growth project and a transit station. The address, 2 The Parkway, is approximately 1300 metres from the nearest transit station (Eagleson Park and Ride) with service to Ottawa, which means that it is more than twice the specified distance that is stated in OP Policy 2.2.3.3(a).

29. On its face the application verges on the nonsensical with respect to OP Policy 2.2.3.3(a). Simply put, the magnitude of the difference between 600 metres and 1300 metres is so obvious and so extreme in a neighbourhood scale of context that I believe this locational shortcoming alone is sufficient to establish that 2 The Parkway is an inappropriate site for the proposed high-rise residential building.

30. Examination of the provided materials confirms paragraph 29. In short, no evidence is provided to establish that 1300 metres and 600 metres are one and the same, or that there is a planning-based flaw in the OP Policy 2.2.3.3(a).

31. Moreover, and drawing upon the experience gained from the Walking Security Index (WSI) project which I conducted for the Region of Ottawa-Carleton and then the City of Ottawa, I rate the walk between 2 The Parkway and the Eagleson Park & Ride as being relatively to highly unsafe, uncomfortable, and inconvenient for many walkers. The empirical support for this observation is based on a number of driving trips along the walk route, and two walking trips which included traversing two unsignalized ramps connecting March Rd. and Eagleson Rd. to a 400-series highway (417), a 4-lane freeway overpass with narrow sidewalks that are made even narrower

by snow which is plowed off the overpass lanes onto the sidewalk, and a section of arterial road that does not have a sidewalk.

32. It is therefore my finding that the proposal does not comply with OP Policy 2.2.3.3(a) to a critical degree.

33. Regarding to the planning principle of “intensification” which is frequently referred to in the application, good planning requires that intensification is put into practice in conjunction with other planning principles, and most notably principles such as integrated land use and transportation planning, and highest and best use.

34. It is fully and completely established in paragraphs 29-31 above that:

- The subject site is more than twice the OP Policy-recommended distance from a transit station:
- No evidence has been located which establishes that a location within 600 metres or less to 2 The Parkway is under construction as a transit-oriented development (TOD) site; and that
- My examination of the application proper as well as associated supplementary documentation did not yield evidence which establishes that the transit system providing access to the subject is being enhanced to such a degree as to achieve the level of transit-land use integration that good planning associates with “intensification” involving high-rise residential (R5) zoning.

35. It is therefore my professional opinion that because the proposal completely fails to satisfy the transit-land use integration condition, the intensification principle is nullified as a planning argument to justify the proposed zoning bylaw amendment.

36. Further in that regard, the failure to satisfy the land use-transit integration condition is a critical counter to the proposed rezoning. That is, approving a zoning bylaw amendment that allows for a high-rise building on 2 The Parkway flies directly in the face of OP Policy 2.2.3.3(a), and requires that the City of Ottawa flat-out and unequivocally contradict its own Official Plan.

37. In addition to the application’s failure to have due regard for the location-intensification connection as it applies to 2 The Parkway, there are precedent-setting consequences imbedded in the application which, if

approved, would no doubt have major, negative planning-related results that would be experienced in the Beaverbrook community and the entire geographical area of the City of Ottawa, as well as by the municipality of the City of Ottawa. The precedents are outlined as follows.

38. In the first case involving precedent, if the application is not required to strictly comply with the boundary figure of 600 metres in OP Policy 2.2.3.3(a), and the boundary is extended to approximately 1300 metres by approving this application, then the door is opened wide for similar consideration being sought for other high-rise development applications located in the same distance zone or envelope -- beyond 600 metres and up to 1300 metres -- from a transit station. Under the condition of non-discrimination, I expect that the City will be obliged to grant all development approvals similar to Zoning Bylaw Amendment Proposal, File: D02-02-11-0101 (City of Ottawa), which seriously negates the value of the Official Plan and the planning function itself in regard to achieving good planning objectives related to such planning principles as sustainability, transit-oriented transportation, compactness, infrastructure cost-effectiveness, etc.

39. In the second case involving precedent, if planning staff, Planning Committee, and/or Council, City of Ottawa, accept the contention that a distance of more than 600 metres meets the intent of OP Policy 2.2.3.3(a), then acceptance of that contention for this application opens the door to arguments that City of Ottawa Official Plan numbers can be “stretched like a rubber band”, thereby setting a precedent for proposing new growth high-rise developments that involve distances of 1500 metres, 1800 metres, etc. Under the condition of non-discrimination, I expect that the City will be obliged to grant such development approvals, which seriously negates the value of the Official Plan and the planning function itself in regard to achieving good planning objectives related to sustainability, transit-oriented transportation, compactness, infrastructure cost-effectiveness, etc.

40. In the third case involving precedent, there is the matter of various “numeric measures” which are expressed in the Official Plan, Zoning Bylaws, and other City of Ottawa documents. In the event that this application is approved, notwithstanding the failure of the application to comply with the 600-metre requirement of OP Policy 2.2.3.3(a), then I believe that the door is open to many challenges to other numeric measures contained in City of Ottawa documents. Simply put, once the City of Ottawa commits itself to allowing 1300 metres to be construed as not different from 600 metres, then the City has at best an extremely shaky methodological leg to stand on when seeking to defend the derivation or the application of a numeric measure.

41. In my opinion, the possible setting of extremely perverse planning-related precedents if this application is approved should be of major concern to the KBCA. I therefore strongly recommend that legal counsel be consulted to ascertain how to deal with what I perceive to be a planning situation that could have seriously disruptive and costly consequences for KBCA members, as well as for other citizens of Kanata and Ottawa.

42. With respect to the PPS and its inclusion of the intensification principle (Policy 1.1.1.1), this principle is widely embraced as a means to counter sprawl-oriented inclinations of municipal councils and developers. However, intensification as an instrument of good planning requires that it is applied judiciously based on pertinent supporting evidence.

43. I am unable to find any substantive evidence in the proposal which demonstrates how the reference to intensification in association with any part of the PPS has any substantive bearing of a good planning nature on the appropriate use of the subject site in general, or when due regard is given to the highest and best use principle.

44. As a second and related comment on the intensification principle at this point in the opinion, I did not find any evidence in the proposal that establishes a connection between this principle and the highest and best use principle as they apply to 2 The Parkway. On the other hand, however, and by way of illustration of how these two principles combine to achieve good planning, the Town Center is by design intended to accommodate R5 uses, so by definition that is one area of Kanata where it is likely that the proposed building would be appropriately located for both intensification and highest and best use reasons. The silence on this matter in the zoning amendment application speaks volumes about the failure to establish an intensification-best use connection for 2 The Parkway.

45. Pages 7, 8 and 9 of the application are largely dedicated to reproducing sections of the Provincial Policy Statement. I find no evidence to support the contention that “The proposed development supports one of the fundamental objectives of the Provincial Policy Statement in promoting cost-effective development patterns that stimulate economic growth.” In the absence of supporting evidence the contention is a hollow claim and represents a serious weakness of the application.

46. In the absence of evidence accompanying each part of the Provincial Policy Statement (2005) that is presented on pages 7, 8, and 9 of the application, the claimed “Findings” at the bottom of page 9 of the application are in my opinion little more than a pronouncement that the proposed

development conforms to the Provincial Policy Statement. It is my further opinion that since the Findings were not derived from evidence, the PPS section of the application lends no credibility or validity to the proposal that 2 The Parkway be rezoned from institutional to high-rise residential

47. Pages 10-15 of the application reproduce sections of the City of Ottawa Official Plan, and include comments on selected matters. In my opinion the comments on page 11 are of a “trivial” nature and do not even begin to deal with consequential issues such as the failure to connect land use and transit, or the failure to deal with the highest and best use principle as a means of addressing the basic question of why, on planning grounds, the property should be rezoned.

48. On page 13 and elsewhere in the application the claim is made that “... the proposed development contributes to a range of dwelling types ...” In point of fact and as noted within the application itself, there is a proximal high-rise in the area, which means that the proposed development is neither new nor different and in fact is a redundant structure. Further in that regard, since the proposed development is similar to an existing residential use in the area, the proposed development would merely add to the housing stock and would not extend the range of dwelling types.

49. With regard to the claimed Findings on page 14, once again I emphasize the lack of evidence in the application to support the purported Findings, and I again note that the claim about intensification has already been examined and found to be a major planning “hole in the fabric” of the application.

50. In regard to the assertion on page 15 that “The proposed development will not generate undue adverse impact on the neighbouring properties”, I did not encounter substantive evidence in the application to support that assertion, nor did I locate an operational, numerical, or other substantive explanation as to what is meant by “undue adverse impact”.

51. Good planning entails the use of clear, precise, and accurate terminology, and the studious avoidance of what might be termed ‘murky phrasing’ in order to avoid misunderstandings and nasty surprises. Phrases such as ‘undue adverse impact’ fail the terminology test and, because there is no numerical methodology or measurement system included in the application, they cannot be critically evaluated. In turn, under that circumstance, it is my professional opinion that any assertions or claims about “undue adverse impacts” in this application are of no value in ascertaining whether the application represents good planning and is in the public interest.

52. Given the imprecision of terminology problem, and the failure to include the method used to derive the contention, I therefore do not believe that it is possible to analytically evaluate the validity of the statement “The proposed development will not generate undue adverse impact on the neighbouring properties” In my opinion this is a critical weakness in the application, and causes me to conclude that the assertion at the top of page 15 of the application is without foundation.

53. The intensification theme is again visited in the application on pages 15-16, and again more of the Official Plan is reproduced (Official Plan Amendment No. 76, and Section 2.2.2 - Managing Growth Within the Urban Area.), accompanied by selected interpretive remarks.

54. As previously discussed in examining the intensification-location relationship, (paragraphs 33, 34, 35, 37, 42, 43, 44, and 45 among others), the subject site is 700 metres beyond the perimeter of the area surrounding the nearest transit station, which means that it is not in compliance with OP Policy 2.2.3.3(a). The application itself acknowledges that the conditions of OP Policy 2.2.3.3(a) are not met, so there is complete agreement between the application and my finding that the application is not in compliance with the City of Ottawa Official Plan.

55. However, the detailed discussion about intensification on pages 15-16 brings to the fore a very different weakness in the application pertaining to the failure of the subject site (2 The Parkway) to be located within 600 metres of a transit station.

56. It is argued in the application that distances from transit stations should be measured differently in different parts of the City of Ottawa and, as an illustration of this argument, it could be postulated that 600 metres in one part of the city might be the equivalent of 1300 metres somewhere else in the city.

57. Examination of the application reveals, however, that this line of argument is unsupported by even one reference from the learned, technical, professional or other pertinent bodies of theoretical or applied literature in such fields as planning, geography, mobility studies, health, sociology, and engineering,

58. In my opinion the failure to ground the 600 metre-1300 metre issue in the literature is due to a good reason. That is, and in my experience, there is little to no mainstream literature in this domain, and to my knowledge no serious study has tested the hypothesis that 600 metres in one area amounts

to or is the equivalent of 1300 metres somewhere else in the same metropolitan area in Ottawa, or in any other metropolitan urban area in Ontario..

59. Therefore, in the absence of empirical evidence that was methodologically obtained in the course of preparing the application, and in the absence of references to reputable literature to support the contention that 1300 metres in the Beaverbrook area is the same as 600 metres elsewhere in the City of Ottawa, it is my conclusion that all the parts of the application which are based on that contention have no substantive scientific merit and, as a consequence, are not credible sources for assertions or professional opinion statements to the effect that the application represents good planning.

60. Due to time constraints it is not possible to critique all the weaknesses in the application. As a result, my attention at this time is limited to selected, significant planning principles which are stated in the application, but for which no evidence or insufficient evidence is provided to give their inclusion much if any credibility.

61. “Diversification” is a planning principle which appears frequently in the application. My review did not encounter empirical evidence, and particularly evidence of a methodologically robust nature, which demonstrates that the proposed development promotes diversification.

62. “Compatibility” is a planning principle which appears frequently in the application. My review did not encounter empirical evidence, and particularly evidence of a methodologically robust nature, which demonstrates that the proposed development meets the compatibility test of good planning.

63. “Revitalization” is a planning principle which appears in the application. My review did not encounter empirical evidence, and particularly evidence of a methodologically robust nature, which demonstrates that the Beaverbrook neighbourhood in the area of the subject site is in need of revitalization, nor why and how the proposed development will serve as a “revitalization” instrument.

64. The “cost-effective” ratio appears at various places in the application. My review of proposal-related materials did not encounter empirical evidence, and particularly evidence of a methodologically robust nature, which demonstrates that the proposed development is in fact a cost-effective use of 2 The Parkway.

65. “Economic growth” is referred to in the application as a consequence of the proposed development. My review did not encounter empirical evidence, and particularly evidence of a methodologically robust nature, which demonstrates that the proposed development – one high-rise building – will promote economic growth.

D. Conclusion

66. In response to the terms of my assignment from the Kanata Beaverbrook Community Association, which is to provide an opinion as to

“Whether the proposal represented good planning and, within the limits of the time budget and financial resources available to me, to inform the client (Kanata Beaverbrook Community Association Inc.) of the strengths and weaknesses of the proposal in regard to pertinent planning principles and good planning practices.”

It is my opinion that the proposed development does not represent good planning.

67. As for the strengths and weaknesses of the proposal, they are identified in both Part B and Part C of my report.

68. In general, I was able to ascertain very few planning-related strengths in the proposal, but I encountered numerous fundamental, planning-related weaknesses involving both planning principles and planning practices.

69. Weaknesses of major concern include non-compliance with the City of Ottawa Official Plan, a widespread lack of evidence to support assertions and opinions, and the high likelihood that approval of the application will establish three precedents that would have significant, negative implications for good planning in Ottawa and other Ontario municipalities, and for the standing of the Official Plan itself as an instrument of good planning.

70. Based on the above analysis, it is my closing remark to the Kanata Beaverbrook Community Association (KBCA) Inc. that the proposed development does not represent good planning, and its acceptance/approval is not in the interest of Beaverbrook area residents in particular nor the public interest in general.

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Materials Provided for Examination

1. Communications from or between the City of Ottawa and/or area residents and/or the Kanata Beaverbrook Community Association pertaining to the matter of “2 The Parkway, Zoning Bylaw Amendment Proposal, File: D02-02-11-0101”.
2. “The Parkway, Zoning Bylaw Amendment Proposal, File: D02- 02-11-0101 (City of Ottawa)”.
3. “Phase 1 Environmental Site Assessment, 2 The Parkway, Ottawa, Ontario”.
4. “2 The Parkway, Kanata – Residential Development Transportation Overview”.
5. “Preliminary Comments to the City of Ottawa” by William Teron.
6. “Resident Comments to the City of Ottawa, Re: 2 The Parkway, Zoning Bylaw Amendment Proposal, File: D02-02-11-0101”