



March 11, 2021

City of Ottawa
Planning, Infrastructure and Economic Development Department
110 Laurier West, Ottawa ON K1P 1J1

Re: New Official Plan - Preliminary Draft

On behalf of the Glebe Community Association, I am pleased to submit our comments on the Draft of the New Official Plan. Our submission is not exhaustive in nature. Having reviewed submissions from a number of other community associations, including those of Old Ottawa South and Crystal Bay, we have chosen not to repeat the very detailed and well-articulated comments of these submissions, and instead to focus on broader priority issues.

We are very supportive of the larger goals of the Official Plan, including the City's aspiration to be North America's most livable city and the vision captured in the "5 Big Moves." We are fully supportive of statements that indicate the importance of neighbourhoods (NHs), and of 15-minute NHs in achieving livability and sustainability goals. However, this area of the Plan seems the most underdeveloped, particularly in relation to its importance in meeting the City's objectives. We support the introduction of the concept of regeneration, but confusingly, the definition provided speaks to the old definition for intensification. We do not see a strong connection between the concept of regeneration and the limited direction provided for how it will actually be implemented.

We advocated strongly for the City to focus on meeting the objectives of the Growth Management Plan through intensification, rather than the costly expansion of the boundary. Consistent with that, we welcome intensification that will increase housing supply for all, including increased (and affordable) options for families and seniors. The key here is having a good understanding of NHs so that we have an approach or mechanism to ensure that NHs can "keep pace," to borrow language from the draft Official Plan. At what point do we have enough or too much density? Given what assumptions and analysis regarding the status of the various supportive elements that must work together for a successful NH?

The new focus on regulating building form rather than unit type is an important tool to remove barriers to more options — assuming we get the actual form right so that we don't sacrifice what makes NHs across the City unique and special, and so we don't sacrifice our tree canopy and our space to gather and live in more generally. This is a new concept and deserving of more explanation and attention.

We welcome the identification of a Special District along the Rideau Canal as well as undertaking a Secondary Plan to look at additional protections for properties facing it. We also welcome the designation of Lansdowne Park, and encourage the City to consider the opportunities presented by the urban park in meeting tree canopy and climate change goals. The urban park plays a key role in

supporting NH and City livability goals and was a foundational element of the redevelopment of the site. Commercial/sporting elements are clearly important parts of this site but should not take precedence.

We believe strongly that building understanding and support for this Plan should compel the City to share its modelling, particularly the implications for meeting growth management objectives. Transparency is essential – without it, residents feel disenfranchised. This only breeds cynicism and conflict.

Finally, we turn to the schedule for moving this Official Plan forward. Staff have put a tremendous effort to deliver this draft document and should be commended. And yet, there are many ideas to be reconciled, and significant gaps that will need time to be filled, if they are to be done properly. Like many other community associations and stakeholders, we have significant concerns about the deadline that has been imposed, even with the most recent extension of time for this to go to Planning Committee. This is a complicated and lengthy document, with many interdependent policies, etc. Like others, we have raised a number of questions, some high level/conceptual in nature, and some quite specific, in order to try to understand the full intent of the document. These questions are yet to be answered. Not to mention the huge volume of comments provided to date to the City that speaks to a wide and complex set of issues. Through our networks, we are not aware of a specific effort on the part of the City to undertake meaningful consultation with Indigenous communities, although we are aware of this requirement. We do not presume to say what form such consultation should take, but raise it here so that we may indicate support for this to be undertaken with respect and in good faith.

Ultimately, the new Official Plan will need to be a more clear and concise articulation of intent and policies. Adding resources to work on discrete areas will only add to the “stovepipe” issues that currently exist in the document. It is not the answer and will not strengthen the coherency of this document. There is a strong team within the OP team at the Planning, Infrastructure and Economic Development Department and we must allow them the time to work through the issues, and get this right.

If we do not take the time to do this properly, we are setting ourselves up for more disagreement and frustration in the future. There is simply too much room for interpretation and ambiguity as it stands – too little direction as to how we will prioritize competing policy. Let’s take the time now to reduce the room for conflict later, ensuring the engagement of key stakeholders to build support. Conflict was a key risk factor expressed by the City during the urban boundary discussion in meeting growth management objectives. From our perspective, conflict will be the true legacy of this Official Plan if we prioritize an artificial timeline over getting it right.

We trust that these and subsequent comments in this submission will be viewed constructively and in the spirit that they are intended – to support a more equitable, diverse, sustainable, resilient and livable City for all.

Sincerely,

Laura Smith
President, Glebe Community Association

Glebe Community Association Detailed comments

Modelling

The City needs to **share the modelling** providing the rationale for how this plan will achieve growth management objectives, and of what our NHs may look like in future under this Plan – before the Official Plan (OP) is finalized, not after.

- This **transparency is critical to building understanding and support for this OP's Vision**. The City needs to “Show, don't Tell.” Right now, it is unclear what the specific rationale is for the upzoning presented in this draft, or explanation of the development potential, in terms of added density.
- The modelling should **demonstrate the case for new density targets, height permissions**, etc. that sets out why we need the proposed minimum density targets, enabling of 3 or 4 storeys on all NH streets, greater height on corridors within NHs, direction for more dense urban form applied to the entire Inner Urban Transects, etc.
- Modelling should demonstrate **how the Plan will help to achieve sufficient density to support 15 min NHs, and provide reassurance that it will not promote over-intensification**, given by demonstrating an understanding of existing NH density/context.
- As part of this modelling, the Plan should **provide a baseline of how dense our NHs are now. Without this, how are we to understand proposed minimum density targets?** This is as a first step in understanding how OP policies could transform NHs across the City. At what level are changes to density to be measured/monitored? On a block/NH/corridor basis?

Monitoring & Reporting

We need a **robust monitoring and reporting plan**.

- Most objectives in the Draft OP are high-level without specific quantification. While we are very supportive of the City's aspirations regarding livability and the 5 Big Moves, we need a realistic plan for measuring progress towards these objectives.
- What are the priorities for what we will measure, and how? Where is the direction for developing mechanisms to adjust the plan, when key assumptions driving the plan change? When and how will the City report on progress?
- The City should establish **baselines for indicators to include measures that will allow us to assess progress toward OP targets** including but not limited to: community and NH engagement, mobility, trees and greenspace, housing affordability, equity and diversity, climate and energy, financial sustainability of growth management, among others.

Transects

A single urban form is too blunt a tool to direct the future built form for all NHs within the Inner Urban Transect.

- The Plan should **clarify the criteria by which areas were put into Transects as well as the intent regarding enhanced urban form**, including height permissions and density targets, and how this will support OP policy regarding trees/canopy/greenspace. For example, the GCA wonders why the north end of the Glebe Annex NH is included in the Downtown Transect.
- Discussion of the Transect should clearly state that the City will develop further direction to **take into account the unique and desired urban form of communities/NHs within the Inner Urban Transect**.
- Given past experience, we are concerned that **if OP language suggests a permission, an applicant can leverage that language**, overriding the zoning by-law and leaving officials and Council with no reasonable basis to object given that the OP takes precedence. The OP must be exceedingly careful with and clarify language so that the City can retain the ability to tailor the intended urban form to reflect context – or the language suggesting the permission should be removed.
- If this Plan intends on **pursuing Form-Based zoning to regulate this dense urban form**, it should be much clearer in stating this intent. This new approach has some real benefits and can assist the City in streamlining zoning and in focusing on regulating what is really essential. It all depends on the specifics of the proposed form, of course, and attention to restricting uses only as necessary. This is a big shift, though, and should be brought forward in discussion of new approaches in the OP and in much greater detail.

Overlays & 15 Min NHs

NHs are central to our ability to absorb intensification and meet livability goals but are the least developed aspect of this plan.

- **The OP must clarify how “Overlays will work in coordination with 15 min NHs, where most residential regeneration is to occur.”** This is fundamental to the success of this Official Plan and, currently, how these policy concepts will be applied and coordinate or work together is not at all clear.
- For example, in the draft OP, an area must meet just a single criterion to be placed in Transforming Overlay. These criteria include: range of services, higher order transit, buildings near end of lifecycle, services capacity, or proximity to major infrastructure (this last criterion is also unclear). **Meeting a single criterion does not seem nearly sufficient to be the basis for identifying an area that could best absorb/be targeted for rapid transformation** that we understand to include the addition of significant density. What is the basis for ensuring livability, completeness, and/or walkability? For ensuring that these NHs can “keep pace” with development? What precisely does “keeping pace” mean? Is frequent and reliable transit an optional element for residents in NHs across the city? We would strongly suggest this is critical for all.
- The City must **commit to developing a clearer understanding of NHs – starting with current (mix of) density, NH “assets” and deficiencies to be addressed to enhance livability/sustainability/walkability/completeness**. The approach should include:

- **Establishing clear, measurable criteria for 15 min NHs that reflects an “Ecosystem” approach, recognizing that the elements work together.** This should include greenspace per resident, tree canopy on mobility routes, degree of connectivity, social amenities, local commercial, density, diversity and equity measures, among others. Proximity to transit and being within 15 minutes of a Hub or Corridor are not sufficient criteria if we are going to meet the City’s ambition for livability. Where are the results of the survey undertaken by the City in the early fall of 2020 that would begin to get at these issues?
- **Recognizing that every NH needs a plan, but set priorities and scale the effort to the need.** The NH planning approach can and should be fit for purpose. Screen to identify priority NHs based on large gaps/needs or opportunities. Adapt the planning tool: use a lighter touch approach when that is all that is required so that we don’t actually diminish the livability assets already in place in many NHs by “transforming” too much, but make sure we are adding assets in NHs where they are truly required. This will also mean that we will be using our dollars wisely.
- **Leveraging the knowledge and capacity of residents to better understand NH needs and potential solutions.** The City recognizes that “residents of a NH know it better than anyone else.”¹ The City should leverage the knowledge and capacity of residents and NH stakeholders to develop plans that will succeed because they are based on what people who live, work, and play there view as necessary to sustain a vibrant NH.
- **Identifying 15 min NHs across the City and mapping them.** The City has provided maps for Transects and Overlays. We need to see the maps of our 15 min NHs and understand the criteria and assessment process by which they have been identified.
- **A clear mechanism to track NH transformation over time** - if the City intends to ensure that NH infrastructure “keeps pace” with development/intensification, NH level analysis is critical. The OP should include policy that is flexible enough to adjust the planning approach, taking into account that **NHs will transition their status** over planning time horizon. Again, establishing criteria or indicators to trigger changes in policy approach.
- **Set density maximums as well as minimums to support more 15 Min NH = “share the density wealth”**
 - Adding density to a NH that is already sufficiently dense to support local commercial and other amenities does nothing for a NH that actually needs people to become more complete and walkable, as well as risking overdevelopment in some areas. It is important that the OP recognize that density supports amenities, and amenities support density. Again, NH indicators/criteria should be the basis for application of policy – and to focusing intensification in areas where it is needed the most.
 - The OP should have **density, regeneration, and livability objectives for all areas of the City, including the suburbs.** The Plan needs to be clear regarding the priorities for the suburbs. Minimum densities of 36 units per net hectare are unlikely to be dense enough to sustain a

¹ Charmaine Forgie, Manager, Public Engagement, City of Ottawa

15 Min NH – what role will the suburbs play in meeting growth objectives in a livable, sustainable manner?

Trees and Parks

- The **Tree Canopy Target of 40% must apply not only at city level but at NH level** as well.
- The draft OP **lacks a clear policy path to the 40% overall target** because it does not take a strong position on retaining or planting trees in the many NHs that currently fall below the 40% threshold.
- The OP needs to be **explicit in requiring permeable space for trees** around buildings in growth, development and regeneration.
- The OP needs to use strong, clear language indicating that authorities including the Committee of Adjustment will grant **tree removal permits in exceptional cases only**.
- OP Section 4.8.2 must be modified to **compel greater protection for trees**. This section seems to aim for significant progress in achieving 40% tree canopy but the ambition is subverted by the section's closing item, 4.8.2.6 which states: "When considering impacts on the urban forest and trees, approvals and Tree Permits [that is, removal permits] shall not be denied for development that conforms to Zoning By-law." Therefore, any request to remove trees by a development that conforms to the Zoning By-law simply cannot be denied, even in a NH well below 40%.
- Missing in the OP is policy support for **urban greening** including wild yards (native plants that support pollinators, and require less water, instead of the traditional monoculture lawn) and local food self-reliance (residential food gardens, expanding community gardens, beekeeping, small edible-fruit orchards, other urban-friendly supports to climate change mitigation and adaptation). These kinds of innovation are in keeping with the City's overarching resiliency goals and are an element of urban design sophistication in a time of climate emergency.
- Policies need to protect mature 15 min NH livability, ensuring setbacks that allow permeability for the mature shade trees essential to encourage walkability and support outdoor living. Inner urban areas are already under increasing pressure to have the greenspace, tree cover and parks essential to a liveable city. Limited or zero setback policies supporting rapid and unrestricted regeneration risk losing that essential amenity.
- **Land dedication for parks needs to be prioritized over cash-in-lieu** in mature Inner Urban (IU) NHs through new **typologies allowing for micro-parks and a policy pro-rating land/CILP contributions when micro-parks are created**. The OP policy requires parkland to be prioritized over cash-in-lieu only if a .04 ha (400 sq m) minimum size is available. In the land-scarce Downtown Core and IU NHs, this will create park-deserts.

Climate Change and Carbon Reduction

The Plan includes language in support of climate objectives, but there is insufficient direction provided to motivate and guide action. Moreover the Climate Change Master Plan (CCMP) targets are not clearly identified and integrated as the OP targets.

- **Energy evolution targets** should be brought into OP including:
 - o for net-zero builds for greenfield and expansion
 - o 100% of new homes are net-zero emissions by 2030
 - o 100% of new commercial buildings are near net-zero emission-ready after 2030
 - o 98% of residential and small commercial existing buildings and 95% of large commercial and industrial buildings are retrofitted for 70% heat savings and 30% electrical savings by 2040 (much of the work to meet these targets needs to start in 2020-2030)
- The OP as it is written misses the opportunity to **require sustainability in new builds**. We would advocate strongly for an approach that includes some non-negotiable requirements coupled with an incentives approach to encourage energy-efficient low-carbon builds, infills and retrofits ('green fast lane' for proposals compliant with High-Performance Development Standard, HPDS).
- **The HPDS is attached to Site Plan requirements**. However we understand that no Site Plan will be applied to low-rise, mid-rise and mixed use buildings (under 10 stories) and therefore the HPDS will not apply to these – that is, it will not apply to virtually all of the infill and redevelopment for densification in NHs. Keeping HPDS out of buildings under 10 stories seriously risks putting our CCMP targets out of reach.
- In the implementation language and approach for the HPDS (at 11.1, especially (2) a), there is a **'trade-off' idea: intensification vs. green standard**. This is completely counterproductive. A better approach would be to have some non-negotiable requirements coupled with an incentives approach to encourage energy-efficient low-carbon builds, infills and retrofits (a 'green fast lane' for proposals compliant with HPDS).
- The OP as currently written gives short shrift to **retrofitting existing buildings** as a way to achieve climate targets. It is a given that the most environmentally sound way to "build" is to retrofit, renovate and, as appropriate, expand viable existing buildings. The OP needs to provide much stronger support to this opportunity. It is patently not the case that all older buildings are reaching the end of their lifecycle; many were built to last and have been maintained so that their "bones are good." The alternative, demolition of worthy buildings and landfilling of their materials, is far from ideal. Moreover the job potential from home retrofits, especially for smaller and independent builders and tradespeople, is huge, but receives no or little attention in the draft OP.
- The OP refers to promoting **local energy generation and renewable energy technologies**. But it offers little detail, nor does it suggest objectives, targets, indicators. In 4.1.1., point 3 currently permitted locations for renewables are listed, along with the statement that a Council-directed in-depth process "may further define" where renewable energy projects may be located. Given the opportunities and the urgency of the climate crisis, far greater intentionality is both appropriate and necessary.
- **The transportation targets in Energy Evolution** should also be integrated into the OP:

- o Active transportation mode share is 21% by 2030
 - o Electric vehicles comprise 90% of new personal vehicles by 2030 (policies, locations and plans for charging stations will be needed)
 - o 100% of the transit fleet is zero emissions by 2030
 - o Bus rapid transit and light rail transit increase in frequency by 2030
- Convenient and highly affordable public transit is critical to the prevention of **needless urban sprawl** through suburban densification towards 15 min NHs.

Lansdowne Designation

The OP's references to Lansdowne are incomplete. It should more clearly describe the Special District by naming the Urban Park that covers more than 50% of the site and includes the Aberdeen Pavilion and Horticulture heritage buildings and the Aberdeen Square. The Urban Park should be distinguished from the commercial part of the site and the wording should acknowledge that the Urban Park is in itself (without special events) a major draw of the site to residents from nearby neighbourhoods and across the city.

The OP also needs to better align with Lansdowne Partnership Plan (approved by City Council in June 2010) by acknowledging the public nature of the site, the importance of expanded green space and the desire for Lansdowne to be a model of innovation in urban form.

Specifically, the OP should:

- Underline the importance of the Urban Park and prioritize the protection of the Urban Park's green spaces (specifically the Great Lawn) and the Aberdeen Pavilion and Horticulture heritage buildings. Public and community uses need to be enhanced and expanded and further commercialization/privatization of Lansdowne Park should be explicitly discouraged.
- Support a move towards 365-day use of the built urban section of the site by directing the diversification of uses from commercial to institutional, cultural, educational and non-profit.
- Support better integration of Lansdowne into the mature established neighbourhoods that surround it, and protect the livability of these 15-minute neighbourhoods, by providing policy direction that the types of events/commercial/residential developments and the urban form and scale of any new buildings need to be compatible with the surrounding neighbourhoods.
- The OP should ensure Lansdowne Park is considered as a possible site for additional tree canopy, and play a key part in fulfilling the City's climate change goals by enhancing the stadium and commercial buildings managed by OSEG with solar panels and green roofs where possible.

Diversity, Inclusion & Affordability

The GCA supports a diverse and inclusive community. However, this NH has been getting less and less diverse, as it becomes progressively less affordable. We support efforts to **pursue affordable housing components in significant size developments** in all parts of the city including our own. If we want Ottawa to be the most livable city, this has to mean housing for all, including the lowest income earners and larger households. Therefore, we encourage **setting targets** in this regard, for example, reducing

homelessness by 50% (or eradicating it, depending on level of senior government subsidy) and reducing housing stress by 50% by 2030.

Site Plan Control

Reductions in Site Plan Control for low-rise buildings meeting “regeneration” objectives would remove important safeguards and should be reconsidered. While we support the desire to reduce unnecessary and costly processes, the Site Plan Control process minimizes the potential impacts of land development on neighbouring properties and promotes safe, functional development by ensuring the City’s standards are respected.

Reduce or eliminate “spot rezoning”

The Plan **should not set the stage for “Spot Rezoning”** in Overlays targeted for “regeneration”. Spot rezoning has been the product of a zoning by-law disconnected from the OP. It has been the source of great conflict between industry and residents, and additional costs. This should be avoided – and certainly not anticipated in the new OP. However, proposed language in Section 5.6.1.1. (the City “shall support... ZBL amendments”) not only anticipates such spot rezoning, but further, appears to place built form and density considerations above all others, calling into question how we will reach objectives for retaining character, trees and greenspace, and general livability.

Level the playing field and develop analysis to support a policy that “growth should pay for growth”

The OP should explicitly provide direction for a mechanism for the City to ensure that “growth pays for growth.” The mechanism should level the playing field between new tract housing in greenfield/ expansion lands and urban intensification. The mechanism should include financial analysis that will support the interests of the taxpayer and municipal and provincial financial sustainability by “promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term.”

Accessible public toilets

The OP should provide direction for the establishment of a network of clean, safe and accessible public toilets. COVID has taught us that they are essential public health infrastructure as well. There need to be public toilets in all parks and recreation areas (e.g. sports fields and splash pads) if people are to enjoy outdoor exercise and leisure time with family and friends.