

**Glebe Community Association Parks Committee Response/Feedback
City of Ottawa Proposed Official Plan 2021**

Submission to GCA Board: February, 2020

Our committee’s review of the City of Ottawa Proposed Official Plan echoes many of the recommendations put forward in our *Evergreen Plan for Glebe Parks*, approved by the GCA Board in September, 2020. The committee is pleased to see an articulated commitment in the City of Ottawa’s proposed Official Plan 2021 to certain urban design first principles regarding new and existing inner urban and downtown core parks. Many of these first principles are re-iterated below, along with suggestions where we think stronger, more specific requirements or language is warranted in the OP.

What follows is a summary of our committee’s deliberations on the proposed OP, followed by a deeper dive into some of the specific issues addressed as prepared by Parks Committee (and GCA Board) member Elizabeth Ballard. Please note that Elizabeth’s work has already been distributed among Board members and others as part of the Board’s inter-committee/board-member consultations on the OP).

I. Summary of GCA Parks Committee Deliberations on the Proposed OP

The proposed OP rightly acknowledges the necessity of preserving, enhancing, and promoting additions to Ottawa’s “incredible parks and greenspaces.” It duly recognizes parks as an essential “cross-cutting issue” to be considered as part of all development decisions. To make this commitment a reality, we urge stronger language, replacing “may” with “will,” and what might be characterized as “lips service” with actual “teeth.”

OP references: 1.1; 2.2

For example:

- As densification/regeneration (instead of greenfield development) continues to be a worthy, reasonable OP objective and is set to increase, we call for the OP to more clearly establish legally enforceable, population-to-parkland ratio targets (**currently omitted in the draft Official Plan**) and mechanisms to regularly measure, report, and address existing inequities in the distribution of green space throughout the city. In particular, the well-documented lack of access to city-managed green spaces in the inner urban and downtown core compared to other neighbourhoods needs to be redressed by the OP.

OP references: 2.1; 4.4.1

- New and existing parks need to be protected from the microclimatic impacts of new, adjacent high-rise development that threaten not only to detract from, but to destroy, the essential community benefits of parks and other greenspace. We favour the goal of denser, small-scale, low-rise, affordable housing options in the OP. These need to be

developed with nearby, equitable, inclusive access to safe, secure, well-lit, shaded, climate change-mitigating, flood-protecting, resilient parks in walkable neighborhoods.

OP references: 2.2.1; 2.2.3; 4.4.6.; 4.6.1.

- We applaud the OP's nod to the principle that shadow from buildings on parks should be minimized, and that tree canopies (part of the 40% urban forest canopy objective by 2050) be protected, along with all other, biodiverse, natural aspects so central to our neighbourhood parks' character. To address the need for more housing intensification as a solution to urban sprawl, we urge the City to use the OP as a tool with actual teeth in this regard; to designate areas other than those bordering new and existing parkland in inner urban and downtown core neighbourhoods for multi-story high rises; certainly to do so before allowing such structures to loom large over existing parks and thus distract from their natural, sunlit character.

This position is consistent with that of the GCA, which at its November 24, 2020 board meeting, passed Motion 2 in regards to the Bank Street Height and Character Study. With this motion, the GCA continued its call for the city "to adhere to height restrictions for buildings along Bank Street, as well as areas of Chamberlain and Isabella Avenues flanking northern section of Bank Street," which include adjacent parks.

As the motion re-iterated, the GCA has advocated for "responsible/appropriate intensification to provide additional housing, rather than expanding of the urban boundary;" but such housing need not be over a certain height near city parks when other solutions that might include high rise developments could be implemented in other areas where it does not detract from an existing neighbourhood's character.

Current proposals for 6 storeys on 8 lots between First Avenue and Roseberry Avenue; and for mid-rise (northwest corner of Bank and Chamberlain) and high-rise height along Isabella are examples of projects which do not adhere to such principles and could be blocked with effective Official Plan restrictions.

OP references: 2.1; 2.2.1; 2.2.3.; 2.2.4; 4.4.6.; 4.5.3; 4.6.1.; 4.6.5; 4.6.6.; 5.1.; 6.2.; 7.1

- Recognizing the scarcity of existing, larger-scale greenspace available for new parks, we urge that the OP revisit its commitment to increasing the number and variety of parks in the inner urban and downtown core through creative, flexible promotion by the OP of city park typologies that are of a smaller, "micro," "pocket park," "linear park," "urban plaza" dimension. **The current Draft Official Plan currently limits the creation of such smaller park spaces as an option.** Enforceable, financially-incentivized prioritization of land dedication for parks over cash-in-lieu, and pro-rating cash-in-lieu to encourage such smaller park space development is a clear, and creative, solution that could be more concretely incorporated into the Official Plan.

OP references: 4.4; 4.4.1; 4.4.2; 4.4.3; 7.1.

- Recognizing the existing inequity of the population-to-parkland ratio in such areas as the Glebe, the City could, through its OP, prevent the siphoning of cash-in-lieu funds that are raised by new development in the inner urban and downtown core to other areas of the city that already enjoy a better ratio, and are not ALSO experiencing further intensification to the same extent as the inner urban and downtown core. Such funds accumulated in aggregate could even be used for the acquisition of existing real estate for the purposes of recreating green spaces, or turning similar attention and resources to surplus properties already owned by the city.

OP references: 4.4; 4.4.1; 4.4.2; 4.4.3; 7.1.

- The committee agrees with the notion that privately-owned green spaces be encouraged and made commercially accessible to residents and customers; such development should, in fact, be incentivized, in addition to, but NOT in lieu of, the creation of new city-managed parks.

OP references: 4.3.2; 4.4.3; 4.8.2.

- We concur that parks and greenspaces here in un-ceded, un-surrendered Algonquin Anishnabe territory should be preserved, enhanced, and promoted in ways that are consistent with the values of, and ongoing consultations with, all stakeholders of the Algonquin Anishnabe Host Nation.

OP references: 1.3.; 2.2.6.; 4.5.; 4.5.4.; 4.6.3.; 4.8.1.; 7.2.;

- The designation of Community Improvement Project Areas is an additional, effective way in which the City can concentrate efforts to implement OP and community-based recommendations.

OP references: 11.3.

- The OP should explicitly prioritize the successful management of dog owners through the implementation of best practices that prevent tree damage and other occurrences that jeopardize the enjoyment of city parks for everyone.

OP references: 2.2.3.

***II: A Deeper Dive into the Issues,
as prepared by GCA Parks Committee (and Board) member Elizabeth Ballard***

Park Issues for Inner Urban and Downtown Core – Comments on Ottawa’s New Official Plan

The new Official Plan (OP) is wide-ranging and necessarily variable in the granularity it brings to issues. The minimum park size for cash-in-lieu of parkland is specified as 400 m², but we

understand City targets of hectares/population will now to be found in the updated Greenspace Master Plan; cash-in-lieu of parkland rules in the OP are outlined in further detail in the Parkland Dedication By-law, permitted park typologies are found in the Park Development Manual, and planning principles linking people, trees, dogs, and transects can be obscure and found in other policy documents. Yet, particularly in the City's urban centre, many such detailed elements are crucial to an integrated planning exercise. I therefore include a collection of Park-related issues here for consideration at the right level.

Many cities have followed best practices to enhance their densely populated centres with diverse, restorative green spaces featuring trees, seating and plantings. Ottawa's new OP has an opportunity to apply some vision and creativity to improve our shared urban existence.

Parks and greenspace provide people with scientifically well-established physical and psychological benefits. To its credit the draft Official Plan recognizes the need to enhance and improve the network of Ottawa's green spaces. However, ensuring natural, green amenities are offered across the city and are easily accessed by all residents no matter where they live is a challenge warranting new policies and approaches. Looking to the future, the Official Plan needs to ensure that existing inequities in the distribution of the green space benefits are rebalanced, and that metrics exist to measure whether this is being achieved.

Compared to the rest of the City, the fact of limited access to park land in the core and inner urban neighbourhoods is well documented. *The Official Plan needs policies that will guarantee these urban areas an increase in parkland that more than offsets the increased densification the plan recommends.* Otherwise, the disparity will increase.

Land costs make acquisition of park land in urban areas challenging. Only if the City sets clear targets for parkland/population ratios will there be legal motivation for the City to ensure creative solutions are found so that urban areas achieve land use patterns that are sustainable and offer protection during global warming. Such targets have been omitted from the draft OP. Returning parkland targets to the DOP can supply a metric to facilitate transparent assessment of whether the City is successfully providing improved distribution of this important health benefit across the city, or taking the easy path, falling behind and contributing to an unhealthy and unsustainable urban centre.

Plans for a 400,000 population gain require creative, sustainable policy solutions. We need to aim for all of Ottawa – even its center – to be habitable and inviting in 25 years. Adding density where it is easiest and hardscaping surfaces where greenspace is already at a premium is not the way to make Ottawa's centre sustainable and a model of best planning practice.

1. Inner Urban and Downtown Core Parks require special treatment and protections.

Greenspace and access to parks and natural spaces is recognized by the City as a physical and psychological health benefit. Other than lack of political will there is no justification for the City to treat the population living in the Downtown Core and the Inner Urban areas as second class citizens who merit less than half the access to healthy living than their suburban counterparts.

In the Glebe the area of existing City parks falls below the City's current target of 2 ha/1,000 people for urban areas, and is less than half of the City's 4 ha/1,000 target for new developments. The table below shows the Glebe's population and compares the Glebe's city parks with the expected parkland called for under City targets.

Population	14 Glebe City Parks (5.6 ha is Lansdowne regional)	Ottawa Urban parkland target	Ottawa City-wide parkland target
Glebe 12,675	15.7 ha	25.35 ha	50.70 ha

The iconic fringe of 30 ha of NCC greenspace along the Rideau Canal also offers a welcome, green destination for locals and many visitors along the eastern edge of the Glebe, just as the massive 20,305-hectare Greenbelt benefits many suburban communities. Yet all NCC land has the limitation of prohibiting community programming, and functions differently from City parks.

Of the Glebe's 15.7 ha of city parks, roughly a third (5.6 ha) is a Regional Park, leaving only 10.1 ha to meet planned community use. With no space available for a soccer field or hockey rink, an Inner Urban community of over 10,000 could certainly benefit from additional city park land. Residents in new communities receive roughly 5 times the parkland the Glebe enjoys. The Official Plan needs to aggressively address the disparity in parkland health benefits between central and suburban regions of the city, finding a way to match an increase park lands with any planned population increases.

2. Management of existing parks in IU/DC should include at least these protective approaches:

- a. *Existing Parks must have their boundaries protected.* Individual parks in the InnerUrban/DowntownCore (IU/DC) transects tend to be small compared to the rest of the City. Current By-Laws allow new developments to be built immediately adjacent to existing Parks with zero side-yard or rear-yard setback. In inner urban areas this is destructive and diminishes the value of the smaller, limited parks people can access.

Side-yard and rear-yard infill can seriously impact access to sunlight, airflow, rainfall and a naturalized experience in existing parks. The City spent good cash-in-lieu money to create the Glebe's Exploration Garden in 2012, an intensively used pre-schooler mini-park above the rest of Central East. Seven years later it approved building a five storey development within one foot of the park, cutting off breezes and sunlight, and jeopardizing a heritage elm tree that anchors the play space. When new development occurs immediately against parks the health benefits and value of those park areas is compromised.

The minimum standard side-yard and rear-yard setbacks for residential zoning of 1.3m and 7m respectively should be applied for any development adjacent to an existing IU/DC park, without exceptions or variances.

- b. *The new OP needs to honour the importance of canopy cover and carbon sequestering, particularly in the densely populated IU/DC.* All mature trees in existing parks need to be protected from any adjacent development, with the City ensuring that the dripline of these park trees remains green even beyond park boundaries for water access and that any site plan prohibits excavation, hardscaping or above ground incursions into the airspace occupied by any mature park trees.
 - c. *Successful management of dog-owners is crucial* so that trees are not damaged and people are not discouraged from enjoying parks. Whether this is achieved through specialized dog parks, public education, user-pay cost-recovery licenses to invest in dog-waste disposal, and tree protection or a combination of these and other measures needs to be open to review of best practices and to be a City priority for IU/DC.
3. **The OP needs a distinctive approach to new development and cash-in-lieu of parkland in the Inner Urban/Downtown Core.** There are three primary issues: land values, the permissible size of parks, and a cash-in-lieu system that is currently designed to syphon park funding from the park-impooverished IU/DC even as the population density increases.
- a. **Increase the number and variety of parks in the core.** The high value of land in the IU/DC encourages developers and the City (which profits from intensification tax-revenue) to prefer cash-in-lieu of park land fees over the creation of parks. Special measures need to be established to mitigate against the financial disincentives for new parks while these central communities are targeted for population growth. The City has articulated the importance of providing all residents with the benefits of natural green spaces and parks for their health and wellbeing. The inner core of Ottawa will better serve the rest of the city if it flourishes with new parks and serves as a model rather than becoming a hollowed-out concrete jungle. We've watched urban intensification play out badly elsewhere and Ottawa's new OP needs to be changed to make the inner city areas liveable and more ecologically sustainable.
 - b. **Add micro-parks to the permitted park typologies.** The new OP states a laudable preference for establishing parks rather than accepting cash-in-lieu of park land, but the stipulated minimum park size required by new development is 0.04 ha, or 400 m².

4.4.4.2) All development, regardless of use, shall meet all of the following criteria to the satisfaction of the City:

4.4.4.2) b) Prioritize land for parks on-site over cash-in-lieu of parkland. **Cash-in-lieu of parkland shall only be accepted when land or location is not suitable. The land to be conveyed shall:**

i. be a minimum of 400 m²

With Glebe developments being built on parcels smaller than 0.5 ha, the prospect of a 0.04 ha park being created is less than unlikely. **Micro-parks as small as 0.005 ha (50 m² need to be included as an option.** A 0.04ha area (100'x40'=409 m²) is larger than many housing lots in the Glebe, approaching the size of a double lot. No developer has been prepared to provide an on-site park of that size in many years, maybe even living memory!

Were the City to permit very small pocket parks, whether of a 25'x25' (=58 m²=0.0058 ha) size or even 25'x50' (=116 m²) size those micro-parks could provide relief from the massing of concrete and glass, with planters, seating, and trees offering a physical and psychological respite for the immediate neighbourhood in the area experiencing intensification. These micro-parks might be a park size the City could insist upon. They might not meet the full cash-in-lieu contribution but a pro-rating system that considers community interests might be worth exploring.

To exemplify the challenge -- and appreciating that the new OP is not retroactive, but to provide an example some are familiar with -- under the new OP Minto's Bank & Fifth Ave Development of 162 dwelling units on a .37 ha (= 3700 m²) parcel would fall under rule *OP 4.4.1, 4, b*):

An alternative parkland dedication rate of 1 hectare per 300 dwelling units shall be applied to parkland dedication for residential development at densities that exceed 18 units per net hectare. For developments types that exceed this density, the parkland conveyance will not exceed a maximum of 10% of the land area of the site being developed. For cash-in-lieu of parkland at this density, the rate will be the lesser of 1 hectare for every 500 dwelling units or 10% of the value of the land as determined by the City's Realty Services Branch;

Save for the 10% maximum qualifier more than half a hectare (0.54 ha or 5,400 m²) of park land would have been claimed so even more land than the parcel itself, but even at 10%, a full 370 m² parkland would have been very welcome at the location, although technically under the 400 m² minimum size for a cash-in-lieu park.

It is essential the City updates its *Park Development Manual* to better meet the limited park opportunities in IU/DC. Currently the smallest permitted parks are Parkettes between 0.4 ha - 1.2 ha in size (ie, a minimum 400 m²), Urban Plazas also with a minimum size of 0.4 ha, and Urban Parkettes ranging from 0.2 ha - 0.4 ha (=200 to 400 m²). Without adjusting these typologies to support micro-parks of under 100 m² the city actively prevents creation of more parks in central Ottawa even as it requires intensification. Why should inner Ottawa be made inhabitable, unnatural and soulless?

See: (https://documents.ottawa.ca/sites/documents/files/documents/park_development_manual_en.pdf)

- c. **Stop syphoning cash-in-lieu funds from the core.** The new OP calls for a distribution of cash-in-lieu that inherently disadvantages the IU/DC, an area already experiencing park-poverty relative to all other areas of Ottawa.

4.4.1, 2), d) Where cash-in-lieu is taken, it shall be principally for the acquisition of new parkland or the improvement of existing local, park and recreational facilities accessible to the area being developed. However, in most cases, the City's Parkland Dedication By-law shall provide for a portion of these funds to be used for park and recreation purposes that are city-wide in scale.

Previously it was guaranteed that more than 50% of cash-in-lieu of parkland be allocated to the neighbourhood experiencing the intensification, and there has been a tradition of a 60/40 split between local and city-wide allocation but even that split may no longer be guaranteed. Why should any of the cash paid to deny park land to the City's core be

allocated to areas that do not serve the neighbourhoods struggling with the population increase? This adds insult to injury.

Allocating 100% of cash-in-lieu revenue to the IU/DC communities experiencing intensification could allow these areas to aggregate sufficient funds to acquire new park land even in the face of high land values.

The City already supports 100% retention of cash-in-lieu in neighbourhoods on the Ottawa Neighbourhood Equity Index:

4.4.2.3) Where a development proposal is...within a priority neighbourhood identified in the Ottawa Neighbourhood Equity Index, City Council may approve an account where 100% of the cash-in-lieu of parkland collected in that area shall be used to acquire new or improve existing parks.

A similar policy retaining 100% of cash-in-lieu funds in IU/DC areas will give park-poor communities the wherewithal to increase their park land, providing residents and visitors with health benefits already enjoyed across the rest of the city.

Why not choose to improve the livability and sustainability of the heart of Ottawa? Keep all cash-in-lieu local.

Many cities have followed best practices to enhance their densely populated centres with diverse, restorative green spaces featuring trees, seating and plantings. Ottawa's new OP has an opportunity to apply some vision and creativity to improve our shared urban existence. Or to pave it over.

The local thirst for this type of greening is sufficient that throughout the central area, volunteers like the Glebe Garden Angels or the Centretown United Church 507 Veggie Gardeners consistently adopt and enhance planters and other available green spaces. An imaginative, smart city could provide minimal ongoing support such as access to water and let nature – in the form of thousands of keen local residents – leap forward at the opportunity to be active citizen gardeners. There is no question: if you build it, they will come. And they will build a greener Ottawa and a stronger community.

A few refs:

<https://glebeca.ca/wp-content/uploads/2020/10/Evergreen-Glebe-Parks-Plan.pdf>

https://documents.ottawa.ca/sites/documents/files/greenspace_master_plan_en.pdf

https://documents.ottawa.ca/sites/documents/files/documents/park_development_manual_en.pdf