



October 30, 2024

Dear City of Ottawa CZBL Zoning team,

The Glebe Community Association (GCA) appreciates the opportunity to review a first draft of the Comprehensive Zoning By-law (CZBL) and understands that a 2<sup>nd</sup> draft is expected in March 2025.

The GCA would like to reiterate its support for intensification rather than expansion of the city's urban boundary, as a more fiscally responsible and climate-friendly strategy for managing the city's growth.

We note that page 13 of Ottawa's Official Plan (OP), in discussion of the city's "Strategic Directions", states that,

*"... growth and development within the built-up area is not only about the numerical targets of intensification and simply increasing urban density. **Intensification is about guiding the evolution of neighbourhoods into complete 15-minute neighbourhoods, which includes ensuring that the services, parks, recreational facilities, public spaces, infrastructure and other elements of a complete neighbourhood, are keeping up with the increases in population.***

*Intensification acknowledges the multiple facets of city-building that **not only adds people but considers other components in planning for liveable complete neighbourhoods, in line with our goal of becoming the most liveable mid-sized city in North America**".*

We would like to take this opportunity to engage regarding the city's proposals for regulating density/intensification and managing the evolution of 15-minute neighbourhoods that keep up with increases in population. Please find below our comments and request for clarification from the city that focuses on two key areas:

- 1) The basis for the assumptions made in support of the Neighbourhood zone caps, and what analysis the city has done of how these assumptions vary in different neighbourhoods (ie. baseline density, redevelopment rate, anticipate future development density, etc.)?
- 2) How the city plans to manage intensification while ensuring that elements of a complete neighbourhood keep up with increases in population so that Ottawa achieves our overall livability goals?

We understand and support the idea that the city moves away from typology-based zoning (zoning that regulates density by type of land use, ie. duplex/triplex, etc.) to form-based zoning (zoning that de-emphasizes density regulation and instead focuses on the permitted "size of the box", etc. on a lot). But the GCA is concerned that proposed density permissions are not sufficiently supported or supportable, and risk serious challenges to livable and complete neighbourhoods, which underpin the city's growth strategy.

We understand that under the new CZBL, the Glebe would be mainly comprised of N2 and N3 zoned lots (roughly 2/3 of all residential lots), N4 lots (roughly 1/3 of all residential lots), in addition to Mainstreet zoned lots on Bank Street and Bronson, a Hub zone at the very north end, and the Lansdowne Special District.

The draft zoning by-law (CZBL) proposes allowing significantly higher residential density at the individual lot level than what's currently targeted in the city's Official Plan for neighbourhood areas in the Inner Urban Transect like the Glebe. The rationale as we understand it, is that significantly more density must be allowed to reach average density targets over the next 25 years. But the question is, how much more? And how will the city ensure that neighbourhoods that achieve "more" density, and more residents, keep up in terms of complete neighbourhood elements?

Specifically:

- For N3-zoned lots, the new limit would allow up to 150 dwelling units per hectare (DUs/H), which is about twice the average residential density target of 60-80 DUs/H.
- For N4-zoned lots, the new limit would be 250 DUs/H, or three times the target.

Additionally, the draft by-law proposes no density caps for lots zoned N4, N5, and N6 (recall that N4 lots make up roughly 1/3 of N zones in this neighbourhood), which would allow even greater density in these areas.

We also understand that the average residential density target of 60-80 DUs/H in the Official Plan doesn't include areas like Mainstreet Corridors (e.g., Bank Street with its mixed-use buildings) or Special Districts (such as high-rise towers at Lansdowne). These areas add much more housing and population to the neighborhood overall.

The scenario used by the city as rationale for such significant permissions assumes a residential neighbourhood with a current density of only 20 DUs/H. It also appears to apply a redevelopment rate of 1%, which we assume to be based on an average rate for the city. But 20 DUs/H is at the very lowest end of the range for current neighbourhood density and not representative of what already exists in the Glebe (or many other Inner Urban neighbourhoods). And while 1% redevelopment rate may be an average across the city, what do such increased permissions mean for neighbourhoods experiencing higher redevelopment rates now and/or in future? Have staff done sensitivity analysis of the impact on neighbourhoods – given that a rough analysis indicates that future projections are highly dependent on this single variable?

It is also not clear how the city intends to "ensure" (assumed to mean: plan for, measure/monitor, manage) the elements of a complete neighbourhood that keep up with increases in population" in the absence of meaningful density caps that would provide some guardrails for more orderly growth. But clearly, it is crucial that the city consider the whole neighborhood when it commits to making sure that essential services and amenities keep pace with population increases.

In that context, the GCA seeks clarification with respect to:

- What is the current residential density within this neighbourhood? Has the city done this analysis for other neighbourhoods?

- What was the basis for the “Target residential density range” (expressed as Dwelling Units/Hectare) in the Official Plan? What assumptions and/or calculations were made?
- How did the city arrive at/develop the maximum allowable density caps in the CZBL? What assumptions and/or calculations were made? Has this analysis been done by neighbourhood? By Transect?
- The city assumes that on average, 1% of neighbourhood zoned lots will redevelop each year. In practice, different neighbourhoods within a Transect will experience very different rates of redevelopment – some much higher, some much lower. In the absence of density caps to act as “guardrails” against intensification that greatly exceed targets, what is the city’s plan for monitoring/managing intensification as well as addressing the resulting needs of neighbourhoods and residents?
- If neighbourhood zones were to reach (or possibly exceed) density targets on an accelerated basis, how will the city accelerate investments in neighbourhood elements needed to support the resulting increase in population?
- How specifically will the city ensure that elements of a complete neighbourhood (parks, rec. facilities, etc.) “keep up” with intensification, particularly intensification that “overshoots” planned density? The Glebe is a wonderful neighbourhood to live, work, and play in. But like many others, it falls well short of city standards and targets in a number of key public amenity areas. In addition, the proposal for Lansdowne 2.0 will add roughly 1500 new residents (~ more than 10% of current neighbourhood population) yet at the same time remove a significant amount of public park/greenspace, with no plan to replace it. With that level of intensification, combined with so much of the neighbourhood zoned N2/N3/N4 (that permits much greater density than 25 year area targets), what is the city’s plan for achieving amenity standards and maintaining livability?
- Finally, please clarify where/how the draft zoning either requires or creates incentives that will result in large-household dwelling supply? Table 3B in the Official Plan states that “Existing lots with a frontage approximately 15 metres or wider - Target of 50 per cent for Low-rise buildings”. Given there are very few lots 15 m or wider in the Glebe, does this assume lot consolidation must occur to trigger this requirement, otherwise it is left to the market/developers?

The above are questions not just for this community, but we assume to be relevant to many other communities across the city.

We would appreciate the opportunity to discuss the issues and questions raised in the comments above with the CZBL team as we seek further clarity and understanding.

We look forward to meeting with you to discuss them at your convenience.

Sincerely,

Carolyn Mackenzie  
Chair, Planning Committee, Glebe Community Association