

March 10, 2021

Alain Miguelez  
Manager, Policy Planning  
Planning, Infrastructure and Economic Development Department  
City of Ottawa

Sent via email to: [Alain.Miguelez@ottawa.ca](mailto:Alain.Miguelez@ottawa.ca); [newop@ottawa.ca](mailto:newop@ottawa.ca)  
With copies to: [jim.watson@ottawa.ca](mailto:jim.watson@ottawa.ca); [rawlsonking@ottawa.ca](mailto:rawlsonking@ottawa.ca);  
[rideaurockcliffeward@ottawa.ca](mailto:rideaurockcliffeward@ottawa.ca); [Stephen.Willis@ottawa.ca](mailto:Stephen.Willis@ottawa.ca); [Don.Herweyer@ottawa.ca](mailto:Don.Herweyer@ottawa.ca);  
[rick.oconnor@ottawa.ca](mailto:rick.oconnor@ottawa.ca); The Community Collective

**Re: Lindenlea Community Association's submission of concerns about the draft Official Plan**

Mr. Miguelez,

The Lindenlea Community Association (LCA) is pleased to have the opportunity to provide feedback and comments about the draft Official Plan for the City of Ottawa. The LCA is a volunteer driven non-profit organization that represents Lindenlea, an established neighbourhood just east of downtown and the Rideau River and north of Beechwood Avenue. As Ottawa's oldest planned community, Lindenlea has important historic significance for Ottawa.

We have reviewed the electronic materials provided by the City of Ottawa related to the draft Official Plan (OP) and discussed it with members of our community. This letter offers our observations, key concerns and requests. The LCA also fully supports the concerns expressed about the draft OP and the process surrounding its creation and its implementation that are contained in the February 24, 2021 letter from the Community Collective (Annex 1).

We are available to discuss any aspect of this submission, and would welcome the opportunity to discuss our concerns, questions and proposals with staff.

## **Key Concern 1: Need to preserve historic Lindenlea**

Lindenlea has historic significance as Ottawa’s oldest planned community. It was developed after World War I as a “garden suburb” by Thomas Adams. The community’s centenary was celebrated on June 30, 2019, where Mayor Watson attended and spoke about the importance of Lindenlea to the history of Ottawa.

The draft OP does not take into consideration the specific and unique history of the upper portion of Lindenlea. Specifically, the draft OP includes historic Lindenlea as part of the Transforming Neighbourhoods approach in the Inner Urban Transects, which would impose intensification requirements that are completely at odds with Thomas Adams’ design approach that was recognized as a model for early Ottawa design and planning.

### **Our Request:**

*The LCA strongly urges that the heritage of historic Lindenlea be respected and preserved through an exclusion from the Transforming Neighbourhoods zone. This would be consistent with the approach taken for other similarly historic nearby neighbourhoods, including Rockcliffe Park and historic New Edinburgh.*

## **Key Concern 2: Impact on Lindenlea of the proposed residential density requirement for Transforming Neighbourhoods in the Inner Urban Transects**

The new city plan supports and encourages a policy whereby single-family units in Lindenlea would be sold, torn down, and rebuilt to accommodate multiple apartments/households. Table 7 on page 127 of the city plan makes allowances for up to four story dwellings within any area of our neighbourhood. As noted under Key Concern 1, this approach would erase the historic significance of Lindenlea as Ottawa’s oldest planned community.

The proposed residential density requirement of 80 units/net hectare for Transforming Neighbourhoods in the Inner Urban Transects would have unprecedented impacts on the Lindenlea community. We are concerned this will radically transform Lindenlea, a neighbourhood we call home, into a place we would no longer associate with being liveable. Moreover, Lindenlea is comprised of small, irregular shaped lots that could not accommodate development in line with the vision that is being imposed.

Residential intensification (regeneration) is already occurring in the Lindenlea community. However, the density requirements included in the Transforming Neighbourhoods overlay would implement requirements that are not feasible. For example, the semi-detached, duplexes and triplexes that have been replacing detached dwellings in Lindenlea would appear to be considered too low a density. A typical Lindenlea lot of 464m<sup>2</sup> (50 foot wide by 100 foot deep) would need to have 3.7 units on it to meet the 80 units/net hectare requirement (if it is determined at a lot level, rather than a neighbourhood level). Streets that currently have mainly single detached dwellings with some semi-detached or row dwelling would be transformed with

new three or four story dwellings. We are concerned that the requirement for 80 units/net hectare will be applied to all interior streets, which comprise the bulk and foundation of the community, and therefore radically transform the character and liveability of Lindenlea.

**Our Request:**

*The LCA seeks greater clarity about the implications of the 80 units per hectare density requirement for redevelopment in Lindenlea.*

*The LCA urges that these density requirements not be imposed on a per lot basis on interior streets and neighbourhoods.*

*The LCA also requests that intensification be spread more evenly across the city and not imposed disproportionately on inner urban transects.*

**Additional Questions:**

**Equity and Intensification**

- Why are long-established neighbourhoods being forced to accommodate 80 unit/hectares density requirement while other neighbourhoods, including newer suburbs with larger lot sizes, only required to meet 40 units per hectare requirements? The burden of intensification should be spread more evenly across the entire city.
- Does 80 units/hectare apply to each hectare or is it averaged by community? What is the unit of measure and how will it be implemented?

**Secondary Plans/Neighbourhood Plans**

- Secondary plans, which provide more local detail than the OP, can only be initiated by the City. How does this effect neighbourhood plans? What are the requirements for creating a secondary plan for a community?
- The current transect approach groups together communities and neighbourhoods into groups with a homogenous approach that does not recognize the nature and character (and in the case of Lindenlea, historic significance) of neighbourhoods. How will density requirements and intensification approaches be imposed with sufficient flexibility to recognize that there are significant differences amongst inner urban core communities?

**Key Concern 3: Need for adequate commitment to Outdoor and Greenspace**

The new city plan specifies that an increase in greenspaces and public spaces should complement greater densification. However, established neighbourhoods such as Lindenlea do not have the requisite space for such parallel development. Moreover, with the Transforming Neighbourhoods approach, we are concerned that the limited greenspace and trees we already have will be sacrificed in order to meet density requirements. The proposed level of density will destroy all remaining mature trees on developed lots in Lindenlea.

Replacement of trees from development should have clear targets (such as the required replacement of trees, types of species, size per mature tree lost) and plan for how they will be replaced. Individual building sites are not required to save trees – how the City is going to reach a 40% minimum target for tree canopy without protecting existing trees is not clear. All tree replacement should have the same diameter of space to grow to the size of the removed tree.

**Our Request:**

*LCA supports stronger language within the new OP that replaces best efforts “shall pursue” language with a mandatory requirements for minimum tree canopy targets by neighbourhood (not simply across the city).*

*The LCA also seeks more information on how the City will guarantee sufficient park and greenspace for all new residents arriving in intensified communities due to regeneration policies. This includes ensuring adequate set-backs with new developments to ensure enough soft-scaping around new trees so that they can survive / thrive.*

**Key Concern 4: Beechwood Avenue as a Mainstreet Corridor**

The new city OP will lead to the facilitation of significantly greater housing development along Beechwood Avenue, creating unsustainable pressure on the surrounding infrastructure to accommodate cars, bicycles and pedestrians in a safe and smooth manner.

Lindenlea and the surrounding communities have serious concerns regarding the blanket application of the Mainstreet Corridor approach to Beechwood Avenue (Beechwood). In particular, Beechwood is being included with Mainstreet Corridors such as St. Laurent Blvd, Merivale Road and Carling Ave, which are wider, multiple lane roads that are completely different in nature than Beechwood. Beechwood is a narrow two-lane street that had been established as a traditional mainstreet prior to World War II. Beechwood meanders through the communities of New Edinburgh, Vanier, Lindenlea and Rockcliffe and is half the width of the other mainstreets it is being grouped with (St. Laurent, Merivale, Carling). A Mainstreet Corridor designation for Beechwood would mean increased heights in a low-rise community and increased traffic volume (particularly given limited transit), which Beechwood cannot sustain. Moreover, existing serious concerns about safety of pedestrians and cyclists on Beechwood would only be compounded with a Mainstreet Corridor approach that is meant for larger and wider streets. Beechwood cannot be lumped together with other larger streets in terms of allowances and zoning rules regarding height, setbacks and density targets.

**Our Request:**

*The LCA strongly urges that the Mainstreet Corridor designation for Beechwood be revoked and replaced with a Minor Corridor designation.*

*The LCA strongly urges that a Secondary Plan be established for Beechwood that encompasses Lindenlea as an adjacent neighbourhood.*

We remain hopeful that draft Official Plan will be improved to reflect the serious concerns raised by the LCA, the Community Collective, community associations and residents throughout Ottawa. The Official Plan will impact Ottawa for decades to come, and we urge you to listen to our concerns and take the time to ensure the vision for our city is one that we can all support and stand behind.

Sincerely,

The Lindenlea Community Association Board of Directors



## **ANNEX 1**

Feb. 24, 2021 Letter sent by the Community Collective (Including the Lindenlea Community Association) to the City commenting on the draft Official Plan:

### **THE COMMUNITY COLLECTIVE**

- Cardinal Glen • Lindenlea • Manor Park • New Edinburgh • Overbrook • Rockcliffe Park • Vanier

Cardinal Glen Community Association  
Lindenlea Community Association  
Manor Park Community Association  
New Edinburgh Community Alliance  
Overbrook Community Association  
Rockcliffe Park Residents Association  
Vanier Community Association

February 24, 2021

Alain Miguelez  
Manager, Policy Planning  
City of Ottawa

Sent via email to [Alain.Miguelez@ottawa.ca](mailto:Alain.Miguelez@ottawa.ca)

Copy to: [jim.watson@ottawa.ca](mailto:jim.watson@ottawa.ca); [rawlsonking@ottawa.ca](mailto:rawlsonking@ottawa.ca); [mfleury@ottawa.ca](mailto:mfleury@ottawa.ca); [newop@ottawa.ca](mailto:newop@ottawa.ca); [Stephen.Willis@ottawa.ca](mailto:Stephen.Willis@ottawa.ca); [Don.Herweyer@ottawa.ca](mailto:Don.Herweyer@ottawa.ca)

Re: Community Collective's significant concerns about the draft Official Plan and process

Dear Mr. Miguelez:

The Community Collective is a group of seven community associations listed above who work together on matters of common interest in our part of the city. We have reviewed the materials provided by the City of Ottawa on the draft Official Plan (OP) and have concluded that the gravity of our mutual concerns warrant writing to you with our collective voice. We offer here some high-level observations and concerns about the draft OP, and the process surrounding its creation and its implementation. We care deeply about the future Ottawa this plan is intended to shape. Please note that each of our organizations intends to provide more detailed neighbourhood-specific comments directly and this is not a substitute for those comments, but rather it is a shared foundation.

1. Don't overlook the lasting effects of the pandemic on urban planning
2. Neighbourhood level plans are critical to success

3. Strengthen Growth Management Framework
4. Protect and enhance greenspaces and trees
5. Consider Social Infrastructure requirements
6. Develop a Results Framework
7. Engage the public effectively

#### 1. Don't overlook the lasting effects of the pandemic on urban planning

We begin with the elephant in the room. Timing of this process has precluded the opportunity to take into account the cascading, long-term social, health, workplace patterns and business impacts of the COVID-19 pandemic. Knowing COVID is here to stay and that more infectious diseases and pandemics are expected in the future, we are very concerned about the omission of any analysis of the relationship between density, health, environmental impacts and disease. There is an abundance of existing research on the ongoing effects of pandemics, which should be consulted and considered as part of an impact assessment. COVID-19 is a virulently aerosolized virus that will require unforeseen investment in structural design and quality control of building and transit ventilation and robust filtration, especially for new variants reported to be more transmissible in high rise buildings and condominiums. It is not wise to simply ignore the effects of COVID-19. Opportunities may be overlooked as well...such as being able to create affordable housing in well-ventilated office towers bringing vitality to the downtown cores.

ACTION: Undertake a social, health and environmental impact assessment of the densification proposed in the draft Official Plan including the implications of COVID- 19 and potential future pandemics.

#### 2. Neighbourhood level plans are critical to success

Individual neighbourhood character matters to resident taxpayers. Transects and overlays are blunt and formulaic instruments allowing little granularity in design by neighbourhood. Optimal density can only be determined at the neighbourhood level. We look for significant improvements to neighbourhood engagement during development of the draft Official Plan, and throughout its implementation. The importance of neighbourhood-specific development plans and secondary plans must be increased, not diminished. Worrisome departures from the understood role of secondary plans, and the meaning of compatibility with existing neighbourhoods have been embedded in the document without warning or forethought.

ACTION: The Official Plan should respect the existing context of neighbourhoods through endorsement and enforcement of neighbourhood plans, in consultation with neighbourhoods and drawing on Annex 9 of the draft OP.

#### 3. Strengthen the Growth Management Framework

The Growth Management Framework needs to be strengthened and refined. It is not, on its own, a plan. Its transects and overlays direct housing density—in some cases mandatory—in others

with mysterious 'reduced requirements', but it neither ensures nor guides all the other supporting features of healthy, serviced neighbourhoods. City staff have advised us that R4 zoning represents a density of 220 units/hectare. For neighbourhoods which are heavily R4 this vastly exceeds the overlay of 80 units/hectare and highlights the importance of protecting and adding greenspaces, as well as establishing upper limits that will protect the neighbourhood's specific context. Market forces alone cannot be relied upon to define and create vaguely defined 15-minute neighbourhoods. The vision for significantly more residents must be supported by clear acknowledgement, assurances and plans to ensure neighbourhoods remain liveable, desirable and that existing weaknesses from crime to deficient tree canopy and greenspaces will not grow worse with this astounding density. New residents, especially the new immigrants to Canada this Official Plan anticipates will move here, must find a welcome sense of belonging. Their arrival must not be associated with the loss of established communities. This City is for the people. This must be a plan for people, not a plan for property.

If higher density spawns more liveable, walkable 15-minute neighbourhoods, why focus the greatest density increases in those neighbourhoods that are already the most dense and liveable? The insistence on "regenerating" existing vibrant, engaged, inclusive, walkable communities is odd. As presented, the density goals appear to put at risk established neighbourhoods that are resilient and successful today. The goal to be the most liveable mid-sized city must be accompanied by a clear vision of what we mean by "liveable". The City Council-approved goal of 60% intensification of existing urban areas particularly those within the NCC Greenbelt risks unforeseen outcomes. This is especially true of an Official Plan that is limited to only directing density of buildings and transit. These two factors alone do not produce healthy, desirable "liveable" neighbourhoods. In addition, the draft target emphasizes the number of units, not their size, liveability, or the existing neighbourhood context. The policy is unambitious and weak in terms of affordable housing, especially family housing; healthy neighbourhoods and new immigrants have families.

**ACTIONS:** Respect heritage, character and liveability of neighbourhoods by making density goals aspirational, not mandatory, and by establishing maximum limits at the neighbourhood level. Assess density targets against measurable social and environmental outcomes. Review impacts and progress periodically. The overlay must be more refined to direct zoning and to be equitably distributed throughout the transects.

#### 4. Protect and enhance greenspaces and trees

The proposed level of density will destroy all remaining mature trees on developed lots, leaving us with considerably less healthy, and consequently less successful neighbourhoods. The past ten years of infill activity has significantly reduced the tree canopy across the city. The draft OP fails to enhance and protect precious greenspaces and trees and the role they play in moderating heat variations, preventing water flooding and providing shelter to birds and insects. We find it unacceptable that the bold goal for densification, mandatory in some communities (but not all), lacks a parallel bold goal for environmental protection of greenspace and exposure to nature.



Just as the draft intensification targets are intended to direct zoning bylaws and confer on development applicants certain “as of right”, so should language on what is needed to accompany intensification be of similarly legal force in City planning (at the neighbourhood level) as well as in the review of development applications. We are disappointed that the Strategy document mentioned in Policy 4.4.3 would have such a narrow focus – “to identify the City’s preferred locations for new parks where higher density communities exist or are expected”. It must be broadened to do what we were led to believe it would do in the City’s Big Move 3- Urban and Community Design, Policy Direction 7 - Develop an Urban Parks Strategy: “Develop a strategy, neighbourhood by neighbourhood, to identify new parks and other public spaces and upgrades to existing parks to provide active recreation and cultural expression in the inner urban area undergoing intensification.” Vague, unambitious and unmonitored targets for tree canopies, greenspaces and energy efficiency technologies are wholly inadequate substitutes. This is particularly true in the context of the City’s declared climate change emergency and commitment to sustainable design principles, tree canopy and climate resiliency. (This is critical to support mental health.)

ACTIONS: Set minimum targets for tree canopy (50%) and greenspace at neighbourhood levels and do not include NCC lands in this calculation. Identify where more greenspaces are needed. Strengthen policies on greenspaces and trees, biodiversity and natural habitat in our northern climate.

#### 5. Consider Social Infrastructure requirements

Strong cities are made of resilient communities. Resilient communities happen when people engage in sustained recurrent interaction while doing things they enjoy. We need to have a land use strategy that will strengthen social infrastructure. A social infrastructure plan is crucial to ensure that the design of communities and their physical conditions deepen people’s relationships and interpersonal networks. Amenities for the 15-minute neighbourhoods, such as libraries, shops, community centres, schools and restaurants are the building blocks of public life; and as such, they are not add-ons, they are central to intensification success. An OP that intends to create upheaval in existing neighbourhoods and build new vertical living without having a social infrastructure plan is reckless and should be scaled back to what it can do to create an affordable and liveable city.

ACTION: Align the Official Plan with a broader social infrastructure plan.

#### 6. Develop a Results Framework

We note the 2003 Official Plan contained many goals, but we have no information on the impact of the 2003 OP. The 2021 draft Official Plan is deprived of lessons learned to guide next steps and support pivotal change. 2021 baseline data are essential to provide important benchmarks that guide a fast-paced trial-and-error approach to achieving goals. An OP Results Framework would specify the desired results expected and the expression of expected results in terms of impact, outcomes (improvements to human well-being and environmental sustainability), intermediate

outcomes and outputs. The targets define the desired performance as endorsed by the City staff and councillors, stakeholders and communities. It would be used to design a Strategic Information System to be used by managers at all levels of the city and their external partners to make evidence-based decisions, adjust course with alacrity in implementation and to account to the taxpayers. The OP Results Framework would build in greater clarity around how competing issues, notably existing character and trees versus dense form, are to be weighed.

The OP policy should set clear density targets and limits for lots, and for neighbourhoods, rather than just minimum requirements. Timely adjustments and improvements to the OP will be crucial as we move into implementation. Nurture confidence through transparency that the City is learning with its partners from insights gained with implementation, and agile and responsive to shocks that are sure to occur in our fast-moving world. All this is conspicuous by its absence.

**ACTIONS:** An entire chapter on the results framework is needed. Correct the conspicuous strategic management deficiency by developing a results-based framework, using it improve decisions and to report on evidence of change – positive or negative. Provide an operational plan and costing to carry out these responsibilities. Develop a formative evaluation plan to identify unintended outcomes. Consider applying sunset clauses to “transformation” once targets for agreed densities are reached.

#### 7. Engage the public effectively

The timeline for this process is unrealistic for meaningful public engagement. The 21 one pagers offered are over-simplifications that cannot reliably be used as the basis for public comments and the survey is biased in favour of the draft OP. The slightly extended period (to March 12th) to review this complicated, convoluted document presenting a vision for the City for public comment over the holiday season and during a pandemic is inadequate. The significant shortcomings of the large document have led to loss of public trust in the process. Ongoing consultation and collaboration with neighbourhoods are critical to achieving the liveable city we all need.

**ACTIONS:** Release a second draft with an additional round of public consultation and opportunity for comment. Take the time to address the issues being raised, to understand implications arising from the pandemic and to get this important document right. Push the finalization of the draft to 2023 as recommended by the Federation of Citizens’ Associations of Ottawa (FCA) or scale back the OP with more modest ambitions. Actively engage with the FCA, this Community Collective and individual community associations.

We remain hopeful the draft Official Plan will be improved to ensure this City will remain one of the most liveable mid-sized cities. We urge you to take the time necessary to get this right.

Sincerely,

The Community Collective