

Old Courtland Park Subcommittee
Carleton Heights and Area Residents Association
Info@ourchara.com



April 12, 2021

Councillor & City of Ottawa Staff
City of Ottawa
110 Laurier Avenue West
Ottawa, ON K1P 1J1

Re: Old Courtland Park Subcommittee Response to Draft 1 of the New Official Plan, an Addendum to Letter dated March 12, 2021 from the Carleton Heights and Area Residents Association

Good afternoon,

We want to thank the City of Ottawa for the bold New Official Plan needed for our growing community. We recognize the City of Ottawa has a housing crisis, and we understand the need for intensification. We support increasing the number of homes in Ottawa and our neighbourhood.

We find the wording of this draft of the New Official Plan is vague given how transformative an impact it will have on the whole inner urban transect, a large portion of the city within the greenbelt spanning from Bayshore to Blair to south of Baseline. Trying to understand what will actually apply to our community is extremely difficult. For example, our neighbourhood currently lacks the infrastructure and services needed for safe and sustainable growth. We are concerned by our lack of access to information on Draft 1 of the New Official Plan with our requests sent to the City by email and online.¹ As residents, we are trying to get answers to specific questions on how this Plan will impact our neighbourhood.

We encourage City of Ottawa planners to slow down the speed of the New Official Plan's (OP) implementation, which is taking place in the pandemic, in order to expand community consultation and gather the evidence needed to mitigate risk to the City – including avoiding inevitable added expense – inherent in the current draft plan.

As volunteers and members of the Board of the Carleton Heights and Area Residents Association (CHARA) Old Courtland Park subcommittee, we are raising concerns for the City in this draft of the OP, particularly with changes to our area, located south of Baseline Road, inclusive of Dynes Road, Prince of Wales (both sides) and Lexington Avenue. This is an addendum to the CHARA letter sent to newop@ottawa.ca on March 12, 2021. We are proud to call Ottawa home and want to be included in the planning process for our growing community.

¹ Access to Information and Privacy (ATIP) Online Request <https://atip-aiprp.apps.gc.ca/atip/welcome.do>

More specifically, we request:

1. City staff members reinstate the Carleton Heights Secondary Plan until existing infrastructure and services deficiencies are resolved to fit our local context, among the emerging risks to the City described below.
2. City staff members ensure Old Courtland Park is removed from the OP Inner Urban Transect designation until development of the Baseline Road transportation corridor is implemented.
3. City staff members complete a more comprehensive, evidence-based analysis of the safety, operations, maintenance and winter-city conditions in Old Courtland Park to ensure the OP upholds provincial standards in our area, such as Reg. 213/07: FIRE CODE under [Fire Protection and Prevention Act, 1997, S.O. 1997, c. 4.](#)
4. City staff members engage in local consultation and the democratic process, delaying voting on the OP to ensure citizens are fully informed and have the opportunity to provide their input. We need more time for dialogue, and more information in the OP that is specific to our area, than the plan provides. Our hope is that together we will develop creative solutions, for an OP in our community.

Local context

The original Courtland Park (or Old Courtland Park) was a small rural subdivision built in 1950 with ‘village’ characteristics. Although a small neighbourhood, Old Courtland Park had ready access to rural arterial roads (e.g., Baseline Road and Prince of Wales Drive). With the growth in Ottawa to the south and west of the area, these arterial roads have become busy and congested commuter corridors.

The interior of Old Courtland Park retains some of these characteristics with its narrow streets (7.5m, nearly 25ft wide to 28ft wide), no areas for permanent on-street parking, and no sidewalks. The neighbourhood has ditches, culverts, and catch basins to manage stormwater. These ditches replaced two streams that were buried by the development in a manner that would not be allowed in modern greenfield developments. Within a few years the ditches had to be deepened and storm sewers brought into the corner of Morley and Sanford to stop widespread sheet (flash) flooding that occurred in the spring and following heavy summer rains.

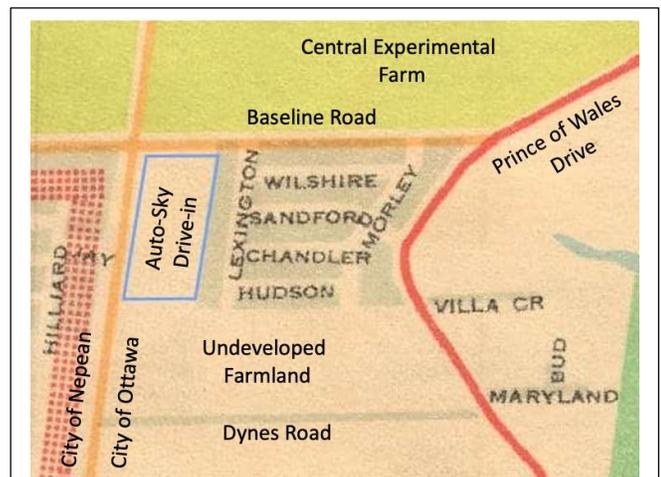


Figure 1: Auto Sky Drive-In shown in blue box adjacent to rural Old Courtland Park circa 1954

The ditches are up to three feet deep, and some of them exceed the maximum recommended 1:3 grade in rural settings. There has been a lack of ditch maintenance by the City since amalgamation (2000),² so the stormwater management system in our area is losing its integrity. The OP does not mention roadside ditches in the Inner Urban Transect, and seems to assume the presence of storm sewers.

² Village Collector and Rural Arterial Collector Road Design. <https://ottawa.ca/en/planning-development-and-construction/community-design/design-and-planning-guidelines/completed-guidelines/village-collector-and-rural-arterialcollector-road-design#7-0-road-typology>

Assumptions

In the absence of a map or other guidance from the City on the OP, we made the following assumptions for old Courtland Park:

- **Hubs** include the southwest corner of Baseline Road and Prince of Wales Drive and the southwest corner at Dynes Road and Princes of Wales Drive.
- **Mainstreet Corridor roads** include Baseline Road and Prince of Wales Drive.
- **Minor Corridor roads** include Dynes Road.
- **Neighbourhood streets** include Morley Avenue, Wilshire Avenue, Sanford Avenue, Chandler Avenue, Hudson Avenue, Griffith Avenue and Lexington Avenue.
- With the OP, the **Carleton Heights Secondary Plan is repealed and not replaced**. Instead, the OP designates the area as an Inner Urban Transect.

Emerging Risks

As a result of our review, we find the OP introduces risks for some areas of our city, including Courtland Park. Please consider the following points for our ongoing discussion:

a. Planning diverts from Healthy Neighbourhood, Healthy Streets Guiding Principles

In this draft of the OP, we find City of Ottawa staff have diverged from 2019 guiding principles for Ottawa neighbourhood streets. We ask that the OP ensure adherence to these guiding principles and develops principles for healthy neighbourhoods that are evidence-based and align with recent findings. For example, our subcommittee reviewed the OP considering the City of Ottawa principles for the design of Neighbourhood Collector Streets (NCS)³ and found that the OP does not follow the NCS' principles that streets need to be:

- **Compact:** *The right-of-way width and distance between opposing building faces are minimized to help foster a sense of safety and community and allow the City to deliver compact neighbourhoods and cost-effective infrastructure.*
- **Complete:** *Streets are accessible and accommodate for all modes and users of all ages and abilities.*
- **Calm:** *Streets encourage traffic speeds in keeping with community context and road safety objectives.*
- **Green:** *Streets provide space and conditions for healthy trees and opportunities to showcase low environmental impact design.*
- **Serviceable:** *Streets include spaces for services and utilities in locations that are both manageable and protected.*
- **Resilient:** *Streets that contribute to resilience to future climate conditions.*
- **Maintainable:** *Streets have relative ease of maintenance and provide space for snow management.*

We ask for consultation to establish and align OP Guiding Principles for healthy neighbourhoods and healthy streets for our area and across Ottawa.

b. Inner Urban Transect Designation without Infrastructure Upgrades

With the OP, Old Courtland Park is rolled into the "Inner Urban Transect"; the area's Secondary Plan is repealed and not replaced. In the late 1970's, the City had to dramatically scale back plans to intensify the

³ Designing Neighbourhood Collector Streets, <https://ottawa.ca/en/designing-neighbourhood-collector-streets>

southeast corner of Fisher Avenue and Baseline Road (former Auto-Sky drive-in theatre) because of inadequate infrastructure, especially stormwater management.⁴

We understand the Carleton Heights Secondary Plan was implemented to halt further intensification of the “Carleton Heights Veterans land Act” subdivisions until roads and sewers could be upgraded. We are not aware of any significant infrastructure changes in our community that would make this Secondary Plan obsolete nor support the new Inner Urban Transect designation for our area. We are especially concerned that inappropriate cancellation of the Secondary Plan may be an oversight due to loss of institutional memory of the limited capacity of our area’s infrastructure and services and the upgrades needed to safely accommodate intensification of this area.

We ask for consultation with the City that considers solutions to avoid over-taxing or damaging the aging infrastructure in old Courtland Park.

c. Reduced Access for Emergency or City Services

Emergency Services accommodation is dependent upon total roadway width. Fire departments buy multi-purpose vehicles to respond to emergencies such as a heart attack, a traffic accident, or fire. These vehicles typically carry first responders to an emergency, and when needed, an ambulance provides transport to a hospital.

The City has not upgraded the minor collector roads and interior streets to “urban neighbourhood” standards in Old Courtland Park. The collector streets remain beneath City of Ottawa standards, even for rural villages (Morley Avenue at Baseline Road, Sanford Avenue at Prince of Wales Drive and Lexington Avenue at Baseline Road). Furthermore, many of the streets in old Courtland Park do not meet the “street” width standard set by *The Ontario Fire Protection and Prevention Act, 1997* to accommodate the need for Emergency Services vehicles and access their equipment on-board. The Act defines “street” as “any highway, road, boulevard, square or other improved thoroughfares 9 m (29.5 feet) or more in width that has been dedicated or deeded for public use and is accessible to fire department vehicles and equipment.”

We ask for consultation with the City to consider solutions that will ensure adequate Emergency and City Services access to our neighbourhood before a tragedy occurs.

d. OP Street Parking Dependency Narrows Streets Further

Permanent on-street parking is currently not legal on collector and interior streets in Old Courtland Park. With insufficient parking on recent intensification projects, Morley Boulevard has been subjected to illegal permanent parking on neighbourhood streets, narrowing them further. Garbage trucks, snowplows, emergency services have had intermittent difficulty navigating streets in our area due to insufficient enforcement of parking restrictions in the By-law. Should Old Courtland Park be designated as an Inner Urban Transect, the following OP sections can further increase the risk to the health and safety of people in our community. In the OP, Section 5.2.2 (3), new units will have no parking, no net increase in driveways and a reactive approach, adding parking with demand. In Section 6.3.2 (2) of the OP, the plan also states, “the City shall establish residential on-street parking permit zones”.

This approach clearly assumes that parking needs can be accommodated by on-street parking, which is already demonstrably false. The relatively modest intensification in our neighbourhood has already increased

⁴ Due to problems with inadequate storm sewer infrastructure and historic risks of sheet (flash) flooding, plans for redevelopment of the former Auto-Sky drive-in theatre were scaled back: <https://ottawastart.com/dark-clouds-hang-over-the-auto-sky-a-history-of-ottawas-first-drive-in-movie-complex/>

permanent street parking, negatively impacting our street safety. For example, recent infill developments on Baseline Road and Morley Boulevard have resulted in more cars, more traffic and less private parking available to each housing unit, resulting in regular and frequent parking on the streets in our community. The planning for Old Courtland Park needs to support intensification without increasing street parking demands.⁵ ⁶ Residents call 311 and request By-law Officer assistance to enforce the no parking zones on our narrow streets, yet the problem remains unresolved.

We ask for consultation with the City to consider parking solutions needed with new development in our area before someone gets seriously injured.

e. Transportation Plan Misalignment

Currently, transitway stations do not exist in our area. We are unaware of a timeline or funding designated for a City project to build these stations. Members of CHARA learned this from a recent application by Novatech (2020) that states: *“Staff do not have a certain timeline for this project. There is no funding commitment in place for this project.”*

Lacking access to quality public transportation, residents continue to have two or more vehicles per household. Furthermore, OC Transpo has cancelled bus routes (bus routes 3 and 13) that previously served the area. Without a timeline and budget for the transit hub for our community described in the OP, residents will continue to require vehicles to travel around the City. The Transportation Master Plan has an origin/destination study planned for the earliest in the spring, 2022, after the OP is presented to Council. We recommend the City consider future trends in consumer behaviour to ensure we understand resident transportation needs.

We ask for consultation with the City and studies to support transportation planning and urban development in our local context before submitting the OP for ratification at City Council.

f. Reduced Pedestrian, Cyclist, Family Safety

Without planning for upgrades to our aging infrastructure in old Courtland Park, the City risks the health and safety of people walking and cycling in the area. Old Courtland Park is already unsafe for pedestrians and cyclists. With narrowing streets, unsegregated cyclist pathways and illegal parking, the streets are becoming more dangerous as intensification proceeds.

We ask for consultation with the City to consider solutions to ensure the health and safety of residents in Old Courtland Park.

g. Increased Traffic and Speeds

With new development in our area, we have witnessed increased traffic flow and driving speeds on our streets (e.g., recent traffic calming studies and infrastructure). Without adding infrastructure improvements to the draft OP, the increase in traffic flow and driving speeds will continue to surge with development, creating real safety issues for homeowners, pedestrians, cyclists, garbage collection and emergency vehicles (fire, medical). So far, we have had near-miss accidents and road-rage incidents on our streets. We have had studies in place for traffic calming, but there are not yet full workable solutions proposed.

⁵ Neighbourhood street design guidelines (Oregon, USA), https://nacto.org/docs/usdg/neighborhood_street_design_guidelines_oregon.pdf

⁶ Edmonton Alberta neighbourhood street design <https://www.strathcona.ca/files/files/at-pds-mns-mmm-body-finaldraft.pdf> and https://www.edmonton.ca/city_government/city_vision_and_strategic_plan/complete-streets.aspx

We urgently require consultation with the City to develop a safety plan for Morley Boulevard and our area, with its narrow streets, illegal parking and needs for traffic calming to reduce the danger to pedestrians, cyclists, and motorists to prevent foreseeable injuries on our streets.

h. Excess Burden on Water, Sewage and Storm Drains

The OP states that the City will have a city-wide target of 40% forest canopy cover (p. 16). We do not see a requirement for canopy cover in the OP for residential development in our neighbourhoods, where people live. Recent infill development has removed older trees without replacing them and built them closer to the street with less setback, resulting in fewer trees, an explosion of hard roofscapes, hard landscaping and less green landscaping for natural water absorption, increasing the burden on our ditches, culverts, and catch basins. With the buried creeks that run beneath old Courtland Park, we are particularly concerned about drainage, grading, and a high and rising water table. The OP plan for development does not appear to follow the intent of designing neighbourhood collector streets, as *“streets (that) provide space and conditions for healthy trees and opportunities to showcase low environmental impact design.”*

We ask for consultation with the City to consider solutions with natural water absorption, without increasing rates of storm water runoff that could overwhelm our stormwater infrastructure; we need to prevent future flooding (e.g., spring freshet, major storms), or greater risk of accidents and damage.

i. Inaccurate Description and Missing Zoning By-law

The neighbourhoods in Carleton Heights are best described by the OP Suburban Transect designation. The OP proposes to divide Carleton Heights into two with the northern half included in the Inner Urban Transect and the southern half included in the Outer Urban Transect. However, the plan does not include a description of how extreme intensification will comfortably coexist with the currently evolving housing of the renewing Carleton Heights.

Without the Secondary Plan, there is no familiar Zoning By-law governing how appropriate development may proceed. New Zoning By-laws are as yet unseen. We have witnessed in Ottawa that developers push for maximum development, even building beyond permissible guidelines. We need to better understand how new housing will co-exist to ensure a community remains. We would like to better understand how communities will settle and share community spaces to ensure development allows for long-term residents, not only temporary homes or short-term rentals. There are insufficient guidelines to delineate what development will be defended at Planning, Committee of Adjustment, or at a housing tribunal.

We ask for consultation with the City to discuss the Secondary Plan and Zoning By-laws to govern height, density, set backs and tree cover to build a strong community.

j. Inadequate Monitoring and Enforcement Capacity

In the OP, we saw many elements removed from previous plans (e.g., November 2020 draft). With the City-wide transformation of the OP, we did not see the City's plan for implementation evaluation with clear metrics to monitor progress and adapt with iterative improvements. We believe good planning includes ample communication and iteration for successful implementation. The OP Section 5.2.4 (pg. 136) and Section 3.2 Table 3 (pg. 50) include Minimum Residential Density and Large Dwelling Requirements (e.g., congruity Infill I and II or R4). How will OP guidelines be enforced? Our committee members think we heard in a meeting with the City that By-Law Officers will ensure OP compliance. In our neighbourhood, we have examples of calling for By-Law Officers and the Officers being overstretched, unable to visit the area to enforce current zoning by-laws.

We ask that we engage in dialogue and consider solutions to monitor, adapt and enforce the OP and its planned development with more consultation in our area through June 2021.

As Members of the Old Courtland Park Subcommittee to the Carleton Heights and Area Residents Association, our preliminary review highlights a number of risks for the City of Ottawa, and the safety and well-being of residents in our area.

We invite you to meet with us and begin reviewing evidence to mitigate risks for the City. We know City staff members care about the public health, safety and infrastructure requirements for intensification.⁷ We want to be engaged and support the City of Ottawa plans for growth. We trust the City will consider our four requests to engage with us and review the 10 emerging risks for the City of Ottawa in more detail before considering ratification of Draft 1 of the New Official Plan with City Council.

Sincerely,

Members of the Old Courtland Park Subcommittee, Carleton Heights and Area Residents Association

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⁷ 2014 Provincial Policy Statement, Planning Act, Sections 1.1.1.a and 1.1.1.g