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Re: Zoning By-law Amendment Application # D02-02-22-0049 at 780 Baseline Road, available at
<https://devapps.ottawa.ca/en/applications/D02-02-22-0049/details>

Dear Laurel McCreight and applicants,

Our association supports intensification as a key tool for the City to respond to new challenges and opportunities. At the same time, the City of Ottawa needs to safeguard the health and safety of Ottawa residents with new development in our neighbourhoods.

The Carleton Heights and Area Residents Association (CHARA) is a volunteer-run community association. We work with fellow residents to build and maintain a safe and healthy community. Our neighbourhoods are bordered north by the Experimental Farm at Baseline Road, east by the Rideau Canal and Rideau River, south near Prince of Wales Drive and west, just past Fisher Avenue. The location of the Zoning By-law Amendment Application # D02-02-22-0049 at 780 Baseline Road rests within the boundaries of our association.

Gathering input

In the summer of 2022, CHARA sought residents' input in the neighbourhoods nearest to the development site. As an association, we had one-on-one conversations, gathered emails, and attended City-led and Councillor-led consultations on the development. Unfortunately, our views expressed in these discussions were not reflected in the "As We Heard It" report on the sessions. As a result of our efforts, we provide the following assessment and recommendations for development to proceed with local support.

Summary of proposal

The Zoning By-law Amendment application was filed to rezone the site with specific provisions for:

- Increased density with a floor space index of 4.1 (instead of 2); and
- Increased building heights to 93 metres (est. 305 feet) for two 25-storey buildings and one 29-storey building instead of 18 metres (est. 60 feet).

The development plan and Zoning By-law Amendment application outline the construction of the following:

- 3 high-rise apartment buildings ranging in height from 25 and 29-storeys,
- 868 residential units for est. 2,604 people: 1.36 hectares or **1915:1** (e.g., 'families', low avg. 3 p/unit),
- 2,895 square metres of ground floor commercial space, and
- 655 parking spaces inclusive of underground and surface-level parking.

Current assessment

Contrary to the applicant's conclusion, without improved analysis, research data and modifications to the development plan to ensure the health and safety of our residents, CHARA does not support the 780 Baseline Rd development and the Zoning By-law Amendment Application # D02-02-22-0049.

Recommendations

Below we provide several recommendations to work with the applicant to improve the development plan for the 780 Baseline Road location – all to ensure the health and safety of Ottawa residents.

1. Comply with the governing Carleton Heights Secondary Plan and Land Use

This development site is governed by the Carleton Heights Secondary Plan and Land Use¹² as a Medium Density Residential Area and potentially a Minor Shopping Area. The Medium Density category is intended to include predominantly row housing, multiple dwelling units ranging from 150 to 248 persons per hectare or in sub-centres and apartment units at a density range of 248 to 300 persons per hectare, not the 2,604 people proposed with this development or 1915 persons per hectare.

The City of Ottawa claims the maximum population for Carleton Heights' Land Use shall not exceed (12,800 -) 16,000 persons within *existing and future public services*.³ With a population of 9,025 people, Carleton Heights has a higher density than most Ottawa neighbourhoods (2,801 people/m² versus avg. 365 people/m²).

At 1915:1, the proposed development introduces at least a 540% increase in density recommended for the site within the Land Use guidelines and the infrastructure, services and behavioural patterns for the area. This one development proposal introduces 2,604 new people, a population at one site equivalent to (91% or) 40% of all capacity in this outer urban area for development,⁴ and far more than neighbourhood-level corner store' convenient retail at 2895 m² of commercial space, in a community that is already struggling with its current infrastructure requirements.^{5 6 7 8 9 10}

2. Align with the 'sensitive integration' principles of the New Official Plan

Although the City of Ottawa Council approved the New Official Plan (NOP) in December 2021, the province has not yet granted its approval. This development proposal highlights the incoherency of the NOP sent to the Minister of Municipal Affairs and Housing for approval in December 2021.¹¹ We disagree with the applicant; this application does not align with the principles of the NOP.

For example, in the NOP, section 4.6.6, entitled ***Enable the sensitive integration of new development of low-rise, mid-rise and high-rise buildings to ensure Ottawa meets its intensification targets while considering liveability for all***, requires new development "minimize impacts on neighbouring properties and the public realm" including "transition requirements" between existing buildings of different heights and new development. The plan goes as far as to say that "buildings shall integrate architecturally to complement the

¹ Schedule G, Carleton Heights Land Use of the City of Ottawa Official Plan, Volume 2a-Secondary Plans, 2.0 Carleton Heights available at: https://documents.ottawa.ca/sites/documents/files/scheduleg_carletonheights_sp_en.pdf

² City of Ottawa Official Plan, Volume 2a-Secondary Plans, Carleton Heights available at <https://ottawa.ca/en/planning-development-and-construction/official-plan-and-master-plans/official-plan/volume-2a-secondary-plans/former-ottawa/20-carleton-heights#2-1-land-use%20>

³ Ibid.

⁴ Area Vibes Inc., Carleton Heights, Ottawa, Demographics, 2021-2022, source: Ottawa, ON data and statistics displayed are derived from Statistics Canada and updated for 2021 by Environics Analytics at <https://www.areavibes.com/ottawa-on/carleton+heights/demographics/>

⁵ CHARA presentation to the City of Ottawa City of Ottawa Special Joint Meeting of the Standing Committee on Environmental Protection, Water and Waste Management and the Agriculture and Rural Affairs Committee, June 27, 2022.

⁶ Letter to Minister Clark with Ottawa community associations, January 6, 2022.

⁷ CHARA feedback on the New Official Plan, March 12, 2021.

⁸ CHARA response to Draft 1 of the NOP, April 12, 2021.

⁹ CHARA walk about and field guide for City of Ottawa staff and River Ward Councillor, July 28, 2021,

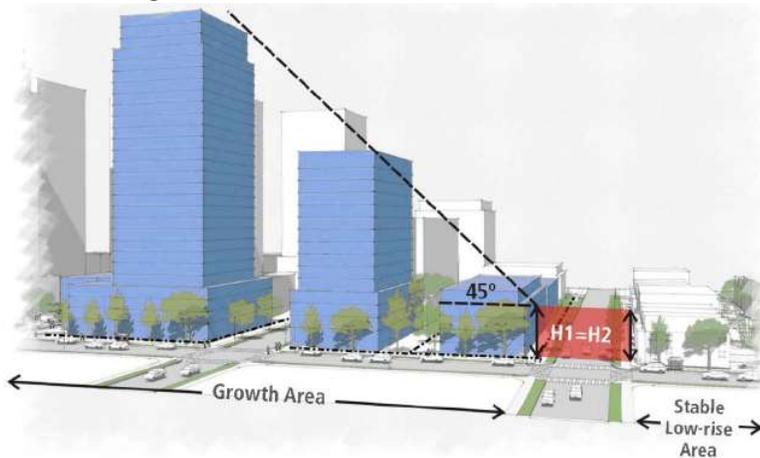
¹⁰ CHARA letter to the Joint Planning Committee and Agriculture and Rural Affairs Committee, October 14, 2021.

¹¹ Blewett, T. *Still awaiting approval, Ottawa's official plan is being scrutinized by the province – and mayoral candidates*, Ottawa Citizen, October 20, 2022 at: <https://ottawacitizen.com/news/local-news/still-awaiting-approval-ottawas-official-plan-is-being-scrutinized-by-the-province-and-mayoral-candidates>

surrounding context.”¹² This is further emphasized in NOP section 5.3.1, **Recognize a suburban pattern of built form and site design**, knowing the Outer Urban Transect is generally characterized by low- to mid-density development and predominantly ground unit forms, that these development changes in land-use characteristics, “this evolution (needs) to happen gradually.”¹³

Please see the images below to compare the NOP plan for ‘sensitive integration’ in contrast to the abrupt transition from the existing mature neighbourhood to the 25-29 storey high rises of this development proposal.

Sensitive Integration of New Official Plan Transitions¹⁴



Abrupt transitions with D02-02-22-0049 Perspectives¹⁵
 (white buildings in the images shown represent current dwellings)



¹² City of Ottawa, New Official Plan, Section 4.6.6, pages 102-105.
¹³ City of Ottawa, New Official Plan, Section 4.6.6, pages 144-145.
¹⁴ City of Ottawa, New Official Plan, Section 4.6.6, pages 102-105.
¹⁵ Zoning By-law Amendment D02-02-22-0049, A300-A303.

3. Ensure Ottawa residents' safety with minimum parking and plans for current demand

This development plan significantly increases the traffic to the local area. New residents and visitors will flow in and out of new apartment residences, while workers and shoppers will travel to and from the office and retail spaces planned for the site.

City of Ottawa guidelines indicate the applicant requires a minimum number of 1828 parking spaces (e.g., 1 per dwelling unit, commercial office and retail space avg. 3 per 100m² and 60 visitor spaces). With only 655 parking spaces, the applicant has allocated **36% of the minimum number of parking spaces required** and nearly 50% lower than the City of Ottawa's stated tolerance of 80% (20% lower than the minimum). With new accessibility design standards and guidelines (e.g., 5 spaces/1 m floor space), the gap will grow between the allocated spaces and the minimum number of parking spaces required.¹⁶

With modest infill development in our neighbourhoods, residents' vehicles permanently and illegally take up space on our narrow streets. (e.g., 25-28 feet wide). Without designated pathways, moving and parked vehicles, pedestrians and cyclists compete for space on our streets. With traffic congestion, vehicles get backed up and block larger streets designated as corridors. Near accidents have occurred. In winter, neighbourhoods have become unserviceable.

By-law officers cannot resolve the breadth of these problems (e.g., on illegal parking: 240 calls, 60 days, only 30 tickets levied). The City has already demonstrated that the existing enforcement agency cannot manage and deter current illegal parking issues.

When considering these minimum parking space requirements, the applicant has not made any attempt to comply with 6.3.3 of the NOP, entitled *Ensure that neighbourhoods form the cornerstone of liveability in Ottawa*; the applicant and the City of Ottawa staff working on the file have not provided a plan to alleviate parking demand while enabling a transition over time towards less automobile-dependent development for on-street parking zones, communal parking garages, parking lots or other permit parking.¹⁷

4. Ensure Ottawa residents' safety with a realistic view of traffic, pedestrian and cyclist flow

The data from the Transportation Impact Study is unreliable. The study relies on data at least six years old or gathered in March 2020 at the beginning of the pandemic when traffic declined. The data does not represent an accurate view of vehicular, bus, pedestrian or cyclist flows in the area, nor the congestion, road rage or near accidents flowing in and out of the development site. A more accurate study is needed to highlight the traffic congestion and dangerous in/outflows to the development area.^{18 19}

Researchers also falsely indicate the high levels of transit service to the area with routes #86 and #89 along Fisher Avenue, #88 along Baseline Road and Heron Road, and #111 along Prince of Wales Drive available at regular frequencies (10-30 min intervals all day).²⁰

Transit service levels have declined significantly in our area. Bus routes 88 and 118 run less frequently and are often cancelled or run late during peak hours. The 86 and 111 routes often fail to stop during rush hour. Public

¹⁶ City of Ottawa By-laws, Part 4 – Parking, Queuing and Loading Provisions at: <https://ottawa.ca/en/living-ottawa/laws-licences-and-permits/laws/laws-z/part-4-parking-queuing-and-loading-provisions-sections-100-114#section-a2ffc109-7d54-45ec-9fa4-9a4d7ef401d4>

¹⁷ City of Ottawa, New Official Plan, Section 6.3.3, pages 176-178.

¹⁸ CGH Transportation, Transportation Impact Assessment for Theberge Development Ltd., May 2022, page 11. Intersection count dates at Fisher Avenue at Baseline Road on August 3, 2016, at Prince of Wales and Baseline Road on March 4, 2020 and Fisher Avenue and Dynes Road on March 9, 2016.

¹⁹ Canadian Institute for Health Information (CIHI), Canadian COVID-19 Intervention Timeline, 2022 available at: <https://www.cihi.ca/en/canadian-covid-19-intervention-timeline>

²⁰ CGH Transportation, Transportation Impact Assessment for Theberge Development Ltd., May 2022, page 8-28.

transit is less frequent, and service has become more unreliable – with increased wait times and full buses bypassing stops – both E-W and N-S over the past decade. Residents often recount the poor transit service levels in the area, detailing long wait times and full buses that do not stop for more passengers.²¹

Since there are no funded transit projects forecasted for completion within the next ten years (e.g., Baseline Rapid Transit Corridor), there is no indication that the City intends to reverse this decline or meet the needs of an intensified community. The City of Ottawa confirms there is no timeline or funding for a transit project in our area. Without adequate transit in our community, this development will continue to exclude residents and increase material harm to the most vulnerable.

5. Ensure health and safety with adequate services and infrastructure capacity

Recent infill has overburdened our community's ageing and fragile infrastructure. With no clear plans to address pre-existing infrastructure deficiencies, this proposal lacks evidence to support its assumptions for the development to proceed.

The proposal site is currently developed containing a 1-storey commercial strip mall and asphalt parking, which ***"appears to be serviced"*** by the 203 mm diameter watermain within Hillard Avenue, the 375 mm diameter municipal sanitary sewer from Hillard Avenue to Fisher Avenue, and three different storm sewers leading to the Rideau Canal and only mention of how 5 year-peak flow volumes will be 'detained onsite,' and disregard for week-long flooding and overflows nearby with the limited capacities of the interdependent problematic stormwater ditch and culvert systems downstream.²² The development team also shockingly suggests a 200 mm sanitary sewer could replace an existing 375 mm diameter service on the site.²³

Recent changes in precipitation trends and cycles coupled with climate model projections of future precipitation require more of our infrastructure and City of Ottawa planners and challenge 5-year peak flow volumes. This approach should not be acceptable to Committee Members, and it certainly is not sufficient for the health and safety of our residents.

Our current Secondary Plan's infrastructure capacity is "based on the present (1980s) zoning." The City is ignoring this capacity constraint with infill that is destabilizing the infrastructure in our community. The data provided here is incomplete as the development will impact residents, households and capacities downstream; the report overlooks historical knowledge and competing reports, introducing this plan for intensification that puts our residents' safety, our properties, our homes and their long-term affordability at risk.

²¹ OC Transpo route service levels consistently unavailable or late, posted to social media including excerpts from Reddit at: https://www.reddit.com/r/ottawa/comments/9pxx5v/a_call_to_86_oc_transpo_riders_please_submit_a/, https://www.reddit.com/r/ottawa/comments/ao2ucq/88_sadness/, and https://www.reddit.com/r/ottawa/comments/1irtw/what_is_the_worst_oc_transpo_bus_route/

²² McIntosh Perry, Assessment of Adequacy of Public Services Report Baseline and Fisher – 780 Baseline Road, May 2022 Stormwater collection disregards downstream capacities/limits : 450 mm diameter concrete storm sewer tributary to the Rideau Canal approximately 1.2 km downstream. 1050 mm diameter concrete storm sewer tributary to the Rideau Canal approximately 1 km downstream. 1200 mm diameter concrete storm sewer tributary to the Rideau Canal approximately 1 km downstream.

²³ McIntosh Perry, Assessment of Adequacy of Public Services Report Baseline and Fisher – 780 Baseline Road, May 2022

Infrastructure upgrades for water (stormwater, wastewater and drinking water) are needed to support intensification – a problem mainly affecting older (ca 1945-50) veterans' subdivisions built and not upgraded to modern urban standards to safely support the City's plan. Water management systems are frail and fail in the face of ongoing redevelopment – a problem identified in the 1970s, regularly occurring in Carleton Heights. Failures cause damage to public and private property and unplanned, expensive repairs.

The Provincial Policy Statement requires that the City of Ottawa ensures the infrastructure and public service facilities are available, appropriate for, and efficiently used for expansion to occur. Otherwise, the City needs to avoid the unjustified, uneconomical, expanded use of local infrastructure. The City will inevitably face liabilities for damaged homes and properties and unplanned, unbudgeted public works projects.

Huge ravines collect stormwater and other contaminants that flow out of our community into the Rideau Canal and Rideau River. Without municipal storm sewers, the delayed release of stormwater into yards and ditches can cause a rise in the already high local water table. High runoff scenarios could contribute to catastrophic basement failures if the water table rises above the level of basement floors. Basements have flooded. The water mains have broken. With the spring thaw and the increased frequency of heavy rainfall events with the effects of climate change, water has flooded our streets beyond, creating health and safety hazards for residents and their homes. Already sump pumps and backup generators to keep them functioning in case of a power failure are necessary to keep the homes in our neighbourhoods dry.

The sewage, water and stormwater management failures of the past need to be considered with this new development proposal and an integrated public services plan introduced to ensure systems are optimized, feasible and financially viable over the long term; to minimize erosion and changes in water balance, and to prepare for the impacts of climate change.

6. Ease residents' concerns and allow for contingencies through the development

The horizon for the implementation of this development proposal is 20 years. For the mature neighbourhoods surrounding the development, construction will introduce significant air and noise pollution with a substantial increase in people, traffic, parking and use of local utilities.

As the world of work has changed, many residents now spend at least a percentage of their time at home. It will be necessary for the applicant to provide a high level of communication over the 20 years of the development. Whether at home on their own attempting to work, caring for themselves, young children or the older generation, mental health, health and economic concerns arise with the disruptions of blasting, interruptions to power or telecommunications services, poor air quality with dirt, dust and debris and intrusions with more people in the area whether on-foot, cycling or in cars.

CHARA suggests the applicant provides recommendations for people to maintain their work and personal schedules, allowing them the time to create contingency plans for harmony with the builders with enough time for residents who may need to reach out to employers, friends, extended family or regional public services for help and support.

At CHARA, we welcome the opportunity to work with the applicant to discuss these recommendations, upholding the health and safety of Ottawa residents. Sincerely,

The Carleton Heights & Area Residents' Association (CHARA)