

January 6, 2022

The Honourable Steve Clark  
Minister of Municipal Affairs and Housing  
College Park, 17th Floor  
777 Bay Street  
Toronto, ON M7A 2J3

Minister Clark:

**Re: City of Ottawa New Draft Official Plan - currently before MMAH for approval  
Requested modifications**

We represent a group of volunteer-run Community Associations in the southwestern area of the City of Ottawa. As defined by Ottawa's new Official Plan (OP) we are in the "Outer Urban Transect", which puts us between the downtown core and the suburban areas of Ottawa. Our neighbourhoods were mainly built in the 1950's to the 1970's and are largely made up of single-family homes.

The other characteristic that our communities have in common is that all our neighbourhoods are adjacent to Baseline Road, a 4-lane arterial road that runs east/west, that currently supports one bus every 15 minutes. Baseline Road is intended to become the new Baseline Road Bus Rapid Transit (BRT) Corridor sometime in the next 15 - 20 years - pending approval of the required implementation funding from the province.

While we generally support intensification as a key tool for the City of Ottawa to respond to population growth requirements and other challenges, we believe there are adjustments that need to be made to ensure the city safeguards the health, safety and quality of life of our residents, given the proposed levels of intensification under the New OP.

As provincial MMAH approval of Ottawa's OP is required under the Planning Act, we wish to convey our collective concerns for your consideration. We believe it is not too late to pay attention to public input and acknowledge that the Minister has the authority to accept or require changes to the Ottawa draft OP.

First and foremost we are asking the Minister through MMAH in the review of the City of Ottawa's new OP to:

1. Require a development hold to be placed on the lands designated as "Evolving Neighbourhoods" adjacent to the Baseline Road BRT Corridor until such time as Ottawa's Baseline Road Secondary Plan is completed, with community input, and then approved by Council. Until then, the Land Use designation in the existing 2003 OP should prevail and remain in full force and effect.
2. Require the City, as an immediate priority, to complete a comprehensive infrastructure and servicing analysis for the proposed 400 metre "Evolving Neighbourhood" intensification overlay, as set through the Baseline Road BRT

designation. A development hold must be placed on these aging neighbourhoods until such time as the City can properly assess, through engineering reports, that existing infrastructure can manage these levels of intensification, additional building and population loads. Any identified infrastructure upgrades that are required to support these proposed levels of intensification must be funded and completed; and

3. Re-designate and revert the proposed intensification area of 400 metres from the Baseline Road back to 150 metres until such time as funding for the Baseline Road BRT Corridor has been secured. This is expected to coincide with the 10-year review of the OP. At that time, the OP can be revised to reflect the actual status of the rapid bus corridor and intensification targets based on additional redevelopment, population growth and actual transit demand.

## **BACKGROUND:**

The future of Baseline Road as a major rapid bus transportation corridor is unique in Ottawa's new OP, and the proximity of our neighbourhoods to this Corridor has immediately placed us within a new set of intensification rules - equal to those being applied to lands along the major Light Rapid Transit (LRT) lines that have been funded and are already under construction. However, the Baseline Road BRT Corridor project implementation is currently unfunded and its construction date is uncertain.

Initially, in early drafts of the new OP, Baseline Road was considered a "Mainstreet Corridor". Intensification would be permitted 150 metres from Baseline Road into the surrounding neighbourhoods, roughly two full blocks into neighbourhoods of largely single-family homes. This intensification policy would have allowed mid-rise buildings of 2 to 9 storeys.

However, "due to a staff oversight", revised text was omitted until the day before Council approval of the OP. This revised text now states that along Baseline Road, because of the future BRT transit stations, intensification shall be permitted within a 400 metre radius of a rapid transit station with buildings from 4 stories to highrises. This proposed designation and extended area would greatly affect all communities along both the north and south sides of Baseline Road, encroaching much deeper into our neighbourhoods. Our communities were not given sufficient time to understand and comment on what we collectively believe is an immoral, inappropriate level of intensification for our existing neighbourhoods.

As a result of intense community outcry and political lobbying efforts by residents prior to approval of the new OP, City staff was instructed to include a requirement to undertake a "Baseline Road BRT Corridor Secondary Plan" and consult with the community residents that will be impacted by this designation. City staff has stated that this Secondary Plan will be a high priority. However, because of the approval of the OP by Ottawa City Council, intensification of our neighbourhoods will continue even before this Plan is in place. Completion of this proposed Secondary Plan, prior to adopting the new OP's "Evolving Neighbourhood" Land Use designation, would provide some assurances to our communities that intensification and new development will proceed in a logical and organized manner and not on a site-by-site development review basis, as is currently the case. This intensification and new development is proceeding without any understanding of the infrastructure requirements to support this high

level of intensification the City hopes to achieve in the "Evolving Neighbourhoods" adjacent to the yet to be funded Baseline Road BRT Corridor. The absence of coherent city planning already endangers our neighbourhoods.

## ISSUES:

- Timing

The proposed Baseline Road BRT Corridor is currently unfunded and not expected to be constructed for over a decade, 10 to 15 years pending implementation funding.

With the 10-year review of Ottawa's New OP scheduled as per the Planning Act, likely in 2032, we suggest that this would be an appropriate date to review, consider and perhaps include the 400-metre intensification designation. At that time a more up-to-date population projection will be available, future bus transit needs will be better understood (post covid), and adequate BRT Corridor funding may have been secured. This timeframe would also allow sufficient time for the City to review and/or upgrade the infrastructure in these affected neighbourhoods to ensure that they are able to receive, accommodate and sustain the proposed new population growth within the "Evolving Neighbourhood" designated lands along the Corridor.

- Infrastructure

Many of the neighbourhoods included in the 400 metre intensification "Evolving Neighbourhood" designation were built in the 1950's; with piece-meal infrastructure repairs done over the years. Water, sewers, stormwater, and collection systems are aging; many neighbourhoods still have 'rural' drainage ditches, culverts, and catch basins that barely manage peak water flows for the existing development during spring thaw or heavy rainfall events.

Recent infill has already begun to reveal the weaknesses of our limited and outdated services, and our poorly maintained infrastructure. New *one-off* intensification building approvals have resulted in changes to grade, water, sewer and sanitation capacity issues, stormwater management control, tree canopy, parking etc. which have also impacted neighbouring homes and surrounding communities. With no clear plans to address existing infrastructure deficiencies, the new OP lacks the comprehensive evidence to support its assumptions for reasonable levels of intensification in our community. Rather, the Council approved OP supports *one-off* development that exacerbates existing deficiencies, and assumes that the best time to upgrade water, sewer, stormwater systems, roads and transit services is when they fail. This is unacceptable and does not constitute good Land Use planning in the public interest.

Also, Ottawa city staff have yet to identify how much density is planned for our communities. In addition to this new "Evolving Neighbourhood" land use designation, many new high-rise development applications have also been approved for hubs along Baseline Road significantly increasing densities in our areas.

These approaches are neither acceptable nor sustainable. As a comparison the City would never allow green field development without adequate services being in place to support new development. Under Ottawa's new OP City Council is creating a double standard for new green

field development vs "Evolving Neighbourhood" intensification development that we believe, again, is not in the public interest.

The Provincial Policy Statement requires the City of Ottawa to ensure that infrastructure and public service facilities are available, appropriate for, and efficiently used for expansion to occur. We suggest that independent third-party comprehensive engineering reports, environmental assessments and reliable, valid data is needed for evidence-based planning decisions and sustainable investments, which in turn will ensure community sustainability and residents' health, safety and quality of life.

- Sustainable Transportation

One of the goals of Ottawa's new OP is to create 15-minute neighbourhoods where residents can walk to most amenities, such as parks, schools and nearby stores. While this is a laudable goal, the new OP, as it is currently written, will not achieve this. Our older neighbourhood segments, including those along Baseline Road, have narrow streets (ie. 25-28 ft wide), no areas for permanent on-street parking and few sidewalks. In many instances there are open storm ditches.

Already with minor infill projects, we see parking has become a major issue in some neighbourhoods. City By-law cannot resolve the breadth of these problems and are unable to manage and deter current illegal parking issues. (ie. 1960's bungalows have been converted into 6+ bedroom student bunkhouses that do not support all of the tenant vehicles.)

With the intensification proposed in the new OP and the focus on transit use in these areas, there are negligible existing or planned sidewalks, including in school zones. Yet street parking will become more common in these neighbourhoods. Residents trying to embrace "walkability" to 15-minute amenities, as well as cyclists, will be forced to share the road with even more vehicles, both moving and parked.

## **CONCLUSION:**

We cannot support these proposed levels of intensification that will affect the health, safety and quality of life of our residents and put further stressors on our area's infrastructure. The true fiscal impact resulting from the City's intensification policies is not understood.

The City of Ottawa's new OP has not met its obligations for sustainable intensification of our communities. Action by the Minister is required!

Given the failure of the Light Rapid Transit (LRT) implementation project in Ottawa, and the city's failure to ensure equal Ward representation at Council, we have lost confidence that the city will be able to effectively manage the levels of development and intensification of our communities in a coordinated, consistent, and transparent manner.

Thank you for your attention to the issues we have raised.  
Yours truly,

The South West Ottawa Community Associations Alliance:

- City View Community Association - Jill Prot & Nancy Wilson (Co-Presidents) [cityviewassociation@gmail.com](mailto:cityviewassociation@gmail.com)
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