



Report on Manor Park Estates Redevelopment

Comments and Concerns from Manor Park Community

10 May 2021

Comments: Application #D01-01-21-0003 (Manor Park Estates)

For More Information on this and other development in the neighbourhood please visit the Manor Park Community Website at:

<https://manorparkcommunity.ca/home/>

and

<https://manorparkcommunity.ca/home/development-review/>

The Manor Park Community Association would like to register its objections to the current proposal by Manor Park Estates for the redevelopment of Manor Park Heights and Manor Park - Gardens. After considerable discussion and engagement with the community, whom we have also encouraged to write directly to the city, we believe that we speak on behalf of the majority of the residents of Manor Park, and collectively we have provided extensive comments. The community has also reached out to offer constructive suggestions for improved implementation and identified opportunities for a viable design. Please see below a summary of the reasons for the overall community rejection of this proposed development.

1. Development Application Summary

Application: Official Plan Amendment

Review Status: Comment Period in Progress till 7 May 2021

Status Date: 2021-04-09

Description: The City of Ottawa has received an Official Plan Amendment application to increase maximum building heights and consider area-specific policies and land use designations for a Master Plan development concept with a range of buildings and uses. The tallest building proposed is 30-storeys.

This application seeks to amend the Official Plan.

The subject site consists of multiple properties within two areas identified in the application as Manor Park North (Manor Park Gardens) and Manor Park South (Manor Park Heights).

Proposal: **Manor Park North (Manor Park Gardens)**

The northern lands are primarily within the northwest quadrant of the intersection of St. Laurent Boulevard and Hemlock Road, with another parcel east of St. Laurent and south of Blasdell Avenue. See the Location Map below. These lands are predominantly surrounded by low-rise



We desire a community that is **environmentally sustainable**, with a walkable neighbourhood and efficient transport systems that reduces car dependency and provides an interconnected network of well-lit paths and streets that facilitates safe, efficient, and pleasant walking, cycling, and driving. We seek a neighbourhood design that blends with the environment and promotes attractive, natural exteriors that maintain or **increases** the amount of usable green space, provide community gardens, and protect mature trees. There should be a range of **diversified** housing typologies that provide affordable housing options for residents and reduce the large surface parking areas in keeping with the zoning and character for the areas and, where there is surface parking and other hardscaping features, that the surface is permeable. The development of Manor Park should facilitate a **socially equal and just community** with mixed rental and for-sale properties geared towards multiple income levels and family types with a variety of unit sizes. Protection should be provided for current tenants, to continue to preserve Manor Park as one of the few remaining neighbourhoods with affordable housing close to the city centre, and job opportunities, and to avoid the unjust gentrification of the neighbourhood at the expense of the existing residents. Manor Park should retain a critical mass of family sized 3-4 bedroom units to maintain its school and playground, and to support other family-oriented amenities. To ensure that the development supports a **thriving community**, we expect that the required social infrastructure and recreational spaces, such as sports fields, swimming pools, libraries, community centres, groups of shade trees, and sunlit gardens will be included in the project. This social infrastructure provides the spatial and social platforms for communities to interact, build social bonds and to ultimately thrive.

Success will be measured as the percentage of residents who attest to having the experience of a village feel, and a sense of belonging.

We have seen through the lens of the COVID 19 pandemic how important the social infrastructure is for community resilience, self-sufficiency, and sustainability, and consider these to be critical elements of any new development.

IS THIS THE TIME?

The OPA has shocked and stressed our community. It impacts the many renting families who face eviction and the people owning properties adjacent to the proposed towers who face loss of light, privacy, sense of well-being, and the personal investments in their homes with this proposal, if accepted.

During the current Covid-19 pandemic crisis, our citizens face risk of illness or death, isolation, and loss of livelihood, with devastating impact on mental health and security. The City of Ottawa has added concern about the terrible implications of this development proposal to the stressful burden of our community during this unprecedented time.

Donald R. Miller, M.D., FRCPC

Susan D. Clarke, LLB

3. Critical Issues

The MPCA expects that the project will introduce 4,060 units across the Manor Park neighbourhood, with a significant impact on the 8,000 current residents, as well as new residents of Manor Park.

a) *Village Plan*

The MPCA would like to recommend that a village masterplan be prepared in detail that sets out:

- an overall vision that extends the dominance and visual continuity of soft landscaping evident throughout Manor Park as the defining village characteristic;
- a visual reference framework regarding the design of the buildings based on “ best practice” built urban development references in comparable urban zones and climate zones;
- an analysis of design options demonstrating that the dramatic building heights provide a desirable benefit at ground level to the community (i.e. the consideration of building higher with the aim of freeing up open space at ground level vs. a low-rise densification option);
- a “rulebook” of visual references indicating the range of high-quality permitted materials to be used on the buildings;
- a ground level/streetscape analysis of projected pedestrian and cycle traffic in the context of future demand;
- a vehicle traffic analysis within the site with particular consideration of underground parking to eliminate cars from the streetscape beyond Hemlock and St Laurent Blvd.;
- a design strategy for street lighting (There is an opportunity to implement 'Dark Sky' objectives – which means ambient light does not escape upwards. Soft lighting is used.);
- a public art strategy with emphasis on Indigenous heritage;
- a retail masterplan for village shopping along St. Laurent Blvd. with curated small floor areas shops, shop windows sheltered by porches and consideration;
- a village wayfinding and signage set of principles and rules (with particular emphasis on St. Laurent Blvd.);
- the design concept of a village square as a central gathering space for the community unencumbered by traffic and with high-quality (permeable) hard and soft landscaping (e.g. cobblestone paving and planting of mature trees);
- an environmental report calculating the carbon footprint of the development and indicating how the energy demand will be (partially or fully) met with central zero-carbon energy generation.

Given the scale of the proposed development, and the long-term impact, the above points are a bare minimum of what needs to be covered in a serious urban masterplan. We look forward to a new plan that achieves these objectives and just as important, should *eliminate the need for costly long consultations building by building.*

b) Construction Waste and Management

The impact caused by construction should be detailed and a management plan put in place. This should include a waste and material reuse plan. The city of Ottawa must consider the impacts that demolition and new construction will have and institute policies, procedures and compliance monitoring to improve waste disposal performance including continuous improvement as techniques evolve during the entire development process from beginning to end. On a project this size, this will entail working with the province and waste management firms to coordinate efforts to sustainably manage construction waste, deconstruction salvage, exchange and reuse. As called for in the *Strategy for Waste Free Ontario - Building a Circular Economy*, this is a group effort, requiring the support and cooperation of all partners, including municipalities, producers, waste management service providers and consumers. Other cities like Vancouver, or levels of government like the NCC, have put green demolition and deconstruction by-laws in place.¹

All regulations regarding asbestos abatement in the demolition must be adhered to and carefully monitored.

c) Multijurisdictional Project Development Plan and Committee

The ambitious scale and scope of the intensification requires a **joint Federal, Provincial, Municipal City and Developer Plan** with clear commitment and accountability from each level, to ensure proportional expansion of needed amenities, protection of the human and natural environment, and a design plan to build local resilience and social capital. The federal government, the NCC, will need to manage increased traffic on parkways and the environmental impacts of intensification. Local school boards, including OCDSB, OCSB, CEPEO and CECCE, need to commit to provision of walkable schooling in Manor Park for primary, middle and high school students from MP and surrounding communities who are currently underserved. The province is responsible for construction waste. The Ward is already calling for greater integration of social services, housing, and educational interventions to address deep-seated poverty.

Given the scope and scale of this community project, MPCA would like the city to take the lead in pulling together a multisector and a multijurisdictional Project Development Committee with community representation. This is not a building-by-building project but rather the creation of a new urban village and should be approached as such.

MPCA would like to see that formal commitments in the plan are captured in a legal memorandum of understanding to ensure measurable accountability by all parties.

¹ i) Selected references: Ontario Materials Market Place, <https://ontario.materialsmarketplace.org>;

ii) Strategy for waste free Ontario - Building a Circular Economy, <https://www.ontario.ca/page/strategy-waste-free-ontario-building-circular-economy>;

iii) City of Vancouver Green Demolition By-Law, <https://council.vancouver.ca/20180516/documents/pspc2c.pdf> , <https://bylaws.vancouver.ca/11023c.pdf>

d) Increased Population Density

The radical increase in density for the R4 and R3 Zone creates significant concerns for an already underserved community. In the current development proposal, we do not yet see the confirmation of the requisite increase in public transportation, social, cultural and recreational infrastructure to compensate for this increase in density.

DENSITY: COMARISION TO WATERIDGE VILLAGE

The land areas of the proposal ..is 35 acres (14.2 hectares) which is on 11% of the land area of Wateridge village. ... The density of MP Management plan is on the order of 286 units per hectare which is more than 1.5 times the highest density on Wateridge Village. Suffice it to say that areas available in MP OPA for the tree canopy greenspace, recreational areas are less than adequate for the existing Manor Park community but would be **ten times less** than the amount of amenities planned for the adjacent community of Wateridge Village.

Kathleen Fischer

e) Zoning and Building Heights

MPCA is concerned about the height and built form of the buildings and the density of the plan, as the building heights exceed, by far, the R3 and R4 zoning provisions. Zoning changes and built forms will need intensive discussion with the community. The building and height massing in general, and the gateway buildings specifically, are of concern (30 storeys and 15 storeys where only 4 storeys are currently allowed).



Figure 3: Building Massing for MP Gardens

The proposed building on the North East corner of Brittany/St. Laurent is too close to the street, and it should continue the set-back line of the high rises on the east side of St. Laurent to protect the view of the river and Manor Park.



Figure 4: Building Massing for MP Heights

This deviation from the current building line is especially evident in Fig. 4 above. Notice how the proposed setback of the existing building on St. Laurent is further from the street in comparison with the new proposed building in the development application. This building is also in close proximity to the existing low rise residential homes in Manor Park Hill. If the proposed setback is allowed this would increase the proposed building proximity to the owned residential homes on Riviera Drive and Apple Tree Lane. The height and density

should be stepping down towards the residential areas, not up from the 23 storey Highlands Complex. Buildings across the street of the proposed 30-storey building on St. Laurent and Brittany are only 13 storeys (the Brigil), 11 storeys (230 Brittany) and 2 storeys (Presbyterian Church). The plan does not have a transition of building heights to the family homes on Apple Tree and Riviera Drive. Currently the transition goes from a small backyard to 12-15 storey buildings. We believe that this emphasizes the inappropriateness of the design proposal and that the proposal is unacceptable in its current form.

It is worth pointing out that there is only one building proposed at 4 storeys (facing Rockledge), and only two 9-storey buildings proposed on Brittany – the remaining buildings proposed have podiums between 2 and 6 storeys, but all buildings have a height between 12 & 30 storeys.

Riviera Drive Home Owner's View of New Towers on Brittany

I've struggled for 12 years to get this home up to a decent standard on one income with countless renovations ... my own elbow grease and scads of roommates, worked extra jobs, even going back to university at 40 to move up my career to keep this house. The trade-off ...Anytime I was having a bad day or in these times a bad year, I could go out into my yard ...feel the sun and feel my mental health load was that much lighter. It is particularly disappointing to me to with one stroke of the pen, my dedication and hard work ...personal investment of over a decade towards personal enjoyment on...will be taken away from me through no fault of my own.

Lorraine Brown

In general, the Manor Park area is part of a well-established community and a low-rise residential neighbourhood. It is predominantly low-rise (2-storey) residential buildings, therefore building high-rise and mid-rise buildings is completely out of proportion with the existing built form. In 2007, the Ontario Municipal Board rendered a decision (No. 2393, August 24, 2007) recognizing the low-rise character of Manor Park, and gave effect to the need for transitioning by approving only 3-storey townhomes on a property abutting low-rise residential houses.

f) Parking

Decreasing the requirement to provide parking spaces per residential unit to 0.25 from the current city requirement of 0.5, to support a "15 minute neighbourhood", is not yet appropriate. The current spatial distribution of services and amenities, and the car dependent design of Ottawa, still requires the extensive use of an automobile. There will be pressure on the surrounding neighborhood streets if parking is not available within the redevelopment. The proposal should consider the creation of underground parking spaces, with green spaces on top for tenants to enjoy, as is common in many dense urban environments. The geotechnical study appears to confirm the feasibility of this concept. There is no seismic soil liquefaction danger.

g) Shadow Patterns

The shadow study shows a significant impact on the neighboring properties on Jeffrey Street, Apple Tree Lane, Riviera Drive and Chelsea drive, because of the excessive building heights. This is especially dire during the winter months.



Figure 5: Shadow Pattern in Winter: MP Gardens



Figure 6: Shadow Pattern in Winter: MP Heights

h) Diversified and Affordable Housing and Poverty

The Manor Park Community has high levels of child poverty: 31% to 37% depending on the quadrant. Fifty percent of the community rents, and of those, 40% spend more than 30% of their income on rent, and a good measure pay 50% or more. There has been little to no support for a targeted poverty strategy for Ward 13 despite joint advocacy with six other community associations since 2018. Disadvantaged children have a better chance to break through the cycle of poverty when they live in mixed income neighborhoods.

We would like to see a more diversified housing stock being produced as part of the redevelopment, in terms of the size and design of houses and apartments, to cater for a broader range of family types and family sizes, as well as a range of affordable housing options to prevent unjust gentrification. Research has shown that increased densification of lower income families requires increased social, health, economic services, and mixed income communities, in a ratio of 60% to 70% higher level income, to 30% to 40% lower income. (See Raj Chetty, Robert Putman).

i) Parks and Recreation

The inclusion of parks in Vanier, Wateridge and Rockcliffe Park gives a false sense of access. Wateridge Village parks are not easily accessible due to the distance from the proposed development. Cardinal Glen Park is small, and requires crossing a major arterial road from MP Heights, while the Macoun Marsh is a wetland conservation area on Beechwood Cemetery land, managed by the Beechwood Cemetery Foundation. It is private land and *not a park*. The incorrectly-named “Copp” Park is a conservation area and is not suitable for active play. Hemlock Park on Meadow Park Place is the largest city park with amenities such as a playground, large open space and mature trees, though lacking in any basketball courts or sports fields. Access for children to the north is dangerous because of the traffic on Hemlock. A 2017 requested crosswalk was not approved by the city.

The greenspace at the Manor Park Public school *is not a public park*, and is at-risk of development into a parking lot for the school, will soon be zoned by the new OP to allow residential use and small commerce! accommodate and the school is already planning to expand “temporary” classrooms (i.e. portables). Meanwhile, London Terrace is turning into a swamp because of a broken city drainage system and has no facilities for team sports, although the lowest parts could be turned into a constructed wetland and used for educational purposes by the Manor Park school and nearby residents. Alvin Heights Park is in very poor condition and the playground equipment does not meet the current code, especially for the children with disabilities living in the city supported Co-op, adjacent to the park. The wading pool and pool building are in terrible condition. One basketball net attracts older kids within feet of younger kids’ play structures.



Figure 7: Access to Parks is Exaggerated.

The current Community Center on OCDSB lands has two small rooms and an office. There is no walkable access to a library, pools, rinks, or arts facilities. No sports fields are accessible except for OCDSB land at Manor Park Public School, and as stated that is planned for reduction. Given the densities proposed, it is imperative that opportunities for greenspaces, parks and recreation for the community are increased.



Figure 8: Proposed new parkland dedication

We are also very concerned that the proposed parks are in PHASE 3 of Manor Park heights and PHASE 4 of Manor Park Gardens, which are nearing the last phases of the developers' proposed plan. There will be a **significant demand** for amenities before those parks are available. This will put existing conservation areas and parks at risk.

The addition of two proposed parks is a welcome and necessary addition, but we would like to see the City's upgrade of Alvin Park and London Terrace Park included in the a final plan as well as the developer adding more greenspace in front of the school.

j) Retail

We are concerned that insufficient consideration has been given to retail around Brittany. Some opportunities for retail were mentioned as being possibilities, but it is not immediately apparent what this would entail and where it would be located. MPCA suggests that it should be concentrated around the gateway building at Brittany and St. Laurent Blvd. There is a growing commitment to buying local and moving away from mall and big-box shopping. This is in-line with the focus on developing 15-minute neighbourhoods in the City's draft Official Plan. MPCA believes that more retail would do very well along St. Laurent Blvd. from Brittany up to the Hemlock/St. Laurent intersection. We would be pleased to work with the developer to curate retail that will be attractive to the community. We hope the city and the developer could jointly work on an incentive model, to ensure *affordable* commercial space is available to attract and support the establishment of smaller locally owned stores and services. Our experience on Beechwood has shown that the higher story buildings crowd out local retail because the retail spaces are not market-priced to attract small retail.

Walking from any area in Manor Park to the corner of Hemlock and St Laurent can easily take 10 or 15 minutes, a high-street atmosphere would do better in that area, rather than further north.

k) Impact on Educational Infrastructure (Manor Park School)

The Manor Park School (built in the early 1950s) is already oversubscribed by OCDSB calculations: teaching taking place in portables; water pipes are lead-based; and there is inappropriate air conditioning and ventilation. A provincial plan and commitment for new schools to accommodate Wateridge, Overbrook, Vanier and Manor Park is needed. The OCDSB Current Plan is to cut one primary school in Ward 13. There is no easily accessible high school. No other school boards currently have schools in Manor Park - importantly there is no French-language school. The local French Public School, Ecole Trille des Bois (on rue Genest in Vanier), is also oversubscribed. Like Manor Park Public School, it is also crowded with aging buildings. In fact, its schoolyard is so small that they stagger recess and there is not a blade of grass in the playground, nor any sports fields. The children often leave school grounds to go to local city parks for greenspace. Schools in both official languages for children who live in Manor Park are currently crowded and inadequate. This must be addressed and a plan in place for educational infrastructure prior to the approval of a development proposal that will significantly increase the local population.

The MPCA seeks commensurate services such as a library and or a community centre to be incorporated into the development framework for the Manor Park neighbourhood in order to ensure that all children in the community have access to the appropriate recreational and educational opportunities.

l) Transport

Manor Park is already suffering from high levels of automobile traffic. High speed traffic along St. Laurent Blvd. makes it a very uncomfortable experience for pedestrians and people using active transportation. High traffic volumes are also problematic along Hemlock Rd., and Brittany Dr., both of which are residential streets. The Manor Park redevelopment will cause massive densification within the neighbourhood, in addition to the traffic impacts from the Wateridge development. To maintain quality of life for residents and maintain reasonable transportation flow, a significant modal shift away from private automobiles will be required. The measures suggested by the proponent of the Manor Park redevelopment are helpful, but in themselves unlikely to be sufficient.

If the City wishes to achieve the level of intensification envisaged within the new Official Plan, it needs to tighten restrictions on automobile travel, particularly at peak hours, introduce more traffic calming measures, and greatly expand public transit services and active transportation infrastructure. It also needs to consider the aggregate impact of multiple developments, not treating each development and associated TIA on a stand-alone basis. Measures are needed to:

- Improve transit (more frequent and reliable service) and transit safety, especially on Hemlock.
- Improve all-season active transportation protected lanes.
- Ensure that traffic is not diverted to residential streets such as Eastbourne and Arundel.
- Protect residences along Hemlock from inappropriate traffic (heavy trucks), pollution and speeding.

The Manor Park neighbourhood is facing considerable automobile traffic volumes under current conditions, and new development, in particular, the extensive Wateridge Village development will greatly increase the pressure. Most of the automobile traffic at peak hours appears to be related to commuters whose residence or place of work lies to the east of Manor Park. Illegal passage of heavy trucks along routes not designated as truck routes, especially along Hemlock, is an added concern.

The TIA recognizes the high background traffic levels,² indicating that all main streets in the area (except Montreal Rd.) have already exceeded the volumes predicted for 2031 and that the west screenline already operates above capacity in the AM peak period. However, the TIA considers only the impact of Wateridge in the background conditions, noting that other developments have negligible trip generation, as indicated in the associated TIAs.³ This faulty logic is common.

While each individual development may have a small traffic impact, the aggregate impact in areas subject to rapid densification can be significant. The MPCA and Beechwood Village Alliance would

² TIA Table 22, p. 36, Table 35, p. 59

³ TIA p. 36



like to see a comprehensive traffic impact analysis for the effects of the continued high densification of projects underway and in planning, including:

- *Minto Building* - 79-90 Beechwood Avenue, 69-93 Barette
- *Smart Living* - Beechwood Avenue east of Hannah (6 floors)
- *Claridge* - 89-97 Beechwood (95 Units)
- *Manor Park Estates (Heights)* on Brittany (2,470 Units)
- *Manor Park Estates (Gardens)* on Hemlock/St. Laurent (1,590 Units)
- *Richcraft* on St. Laurent between Karen Way and Coleford Place
- *New Edinburgh Developments*
- Possible east end Interprovincial crossing (TBD).

The TIA incorrectly characterizes the Aviation Parkway as an “urban freeway”.⁴ In the area adjoining the proposed development, the Aviation Parkway does not have freeway characteristics. It has a two-lane cross-section, a MUP on the west side and a 60 km/hr speed limit. Commercial vehicles are banned. The NCC characterizes the parkways as follows:⁵ *“The NCC’s scenic parkways are gateways into Canada’s Capital Region, which offer beautiful perspectives of the Capital to residents and visitors.... The parkways are cultural landscapes, linking important landmarks within the Capital, including Parliament Hill and many national museums and institutions.”* The Aviation and Sir George-Etienne Cartier parkways are not intended to be commuter routes and their use for that purpose should not be encouraged.⁶ These are important natural areas for animals: migratory birds, mammals and insects.

The TIA bases its analysis on a modal share split *“to approximate the 15-minute neighbourhood travel patterns”*.⁷ Compared to the current situation, this modal split doubles the share of both walking and cycling and increases transit use by about 50%, while reducing auto use by about 50%.⁸ These are aggressive targets, as the TIA acknowledges.⁹

The development of Brittany into a multi-mode of transport (vehicular, pedestrian, cycling) and the introduction of better cycling infrastructure fronting the development on Hemlock and St. Laurent is welcomed. The demand management guidelines recommended for the development,¹⁰ in particular unbundling parking costs, are laudable, but in themselves are unlikely to achieve the required shift in modal split. It is likely that the shift can occur only with implementation of measures at the City level (which may require policy and legislative changes at the provincial and federal levels as well), such as congestion charges and high taxes on parking

⁴ TIA p.6

⁵ <https://ncc-ccn.gc.ca/places/parkways>

⁶ This is suggested in the TIA at p. 60

⁷ TIA p. 31

⁸ TIA Table 16, p. 31

⁹ TIA p. 43

¹⁰ TIA p. 54

spaces. Complete street features need to extend along the entire Hemlock-Beechwood corridor and along St. Laurent Blvd. north of Montreal Rd., even in areas not fronting on the development.

The TIA cites¹¹ connections to the St. Laurent LRT Station, and future Hemlock Road transit priority measures to the west as factors justifying the assumed increase in transit usage. But the fact remains that the St. Laurent LRT station is currently best accessed by automobile, and transit improvements along both St. Laurent and Hemlock are merely aspirational, with no plans developed at this point.

m) Transit

Given the number of units to be built and the increase in transit modal share, the TIA estimates that within the Manor Park Gardens area, the service demands would be approximately one and a half to two times the existing service for the Manor Park Gardens area and within the Manor Park Heights area, the service demands would be approximately one and a third-to-one and two thirds times the existing service.¹² Given this increase in ridership, there would need to be a considerable increase in service on OC Transpo routes 7, 17, 12 and 15, in turn requiring transit priority measures on St. Laurent, Hemlock and Montreal Rd.¹³ Tangible plans exist today only for Montreal Rd. It is also difficult to see what effective transit priority measures could be introduced along St. Laurent Blvd. between Montreal Rd. and Hemlock Rd. and along Hemlock Rd. Both streets have a two-lane cross-section and relatively narrow right-of-way. Moreover, Hemlock Rd. links to Beechwood Ave., which is winding, has multiple traffic lights and is already highly congested by automobile traffic, leading to transit delays.

The City needs to commit to improving transit conditions along St. Laurent and Hemlock before construction of the development begins and before access to Wateridge is provided via Hemlock. Failure to do so will unleash a tsunami of automobile traffic to roads within the neighbourhood.

n) Environmental Impact

Many of the above-mentioned critical issues have significant overlap with environmental concerns about the Proposed Redevelopment Master Plan and Official Plan Amendment, including but not limited to detailed comments pertaining to adequate services to support intensification and increased population density, parks and recreation amenities, transportation and public transit, and incorporation of retail space, so will not be repeated here.

As a first principle, urban densification is an important tool to reduce greenhouse gas emissions, combat climate change and mitigate many other environmental concerns relating to urban sprawl, including loss of valuable agricultural land and threats to mature ecosystems. As expressed by Ecology Ottawa's Action Plan for 15-minute neighbourhoods, more density is crucial, but must be done with care. They state:

¹¹ TIA p. 53

¹² TIA p. 57

¹³ TIA p. 58

“When it comes to cities and climate change, there is a clear and widely observed rule of thumb: the denser the city, the lower its carbon pollution. Density is a powerful tool in the fight against climate change, but it can’t happen with the flick of a switch. It takes policy ambition and, underpinning that, community support for more bustling, dynamic neighbourhoods. Also, density is a means not an end; it needs to be combined with smart policies that enhance, rather than degrade, the vitality of our neighbourhoods.”

As outlined in the preceding sections, the MPCA has significant reservations regarding the ability of the City of Ottawa and the developer to deliver on the essential social, recreational, commercial and transportation-related infrastructure that would ensure the liveability of this project and its associated population density increase.

Specific environmental concerns include the following:

- The Manor Park Redevelopment Master Plan and Vision Manor Park website highlight environmental sustainability as one of the project's guiding principles and states that the project will be inspired by One Planet Living. Inspiration, though admirable, is not a plan nor is it adherence to any meaningful sustainability targets. The OPA Application, Application Summary and Project Master Plan, employ only vague language around sustainability. They do not demonstrate a tangible commitment by the developer to adhere to the 10 principles of the One Planet Living Framework (copied below from <https://www.bioregional.com/one-planet-living>) or any other targets (i.e. LEED certification at minimum).
- It is worth noting here that Ottawa-Gatineau’s own Zibi development is striving to be Canada’s most sustainable community and is explicitly committed to adhering to all 10 principles of the One Planet Living Framework. Zibi has a One Planet Action Plan, produces annual reports and uses the framework to guide every facet of its development. So far, the Manor Park redevelopment proposal does not indicate any real intention to embed any sustainability framework or targets to the project development as a whole.
- Multiple high-rise towers of 20-30 storeys within such close proximity to existing homes, apartment complexes and urban nature areas, and the insufficient provision of enough ground-oriented units reflect limited consideration to the One Planet principles which relate to health, equity and community. The lack of sufficient ground-oriented units for families who will be displaced from current townhomes and who currently enjoy large front-yards is particularly concerning.
- Notably absent in the Master Plan is any reference to the One Planet principles of Zero Carbon Energy Buildings and Renewable Energy sources, use of Sustainably Sourced Materials & Products for construction, or any Zero Waste or Zero Pollution targets for the construction of the development itself. Referencing One Planet Living principles in the project's promotional





materials and website, while the master plan submitted for the OPA lacks any detail relating to these crucial One Planet Living principles is dishonest and amounts to greenwashing.

- **Mature Tree Canopy:** The Environmental Impact Statement and Tree Conservation Report anticipates that 122 mature trees will be removed to allow for construction of the project out of 449 existing mature trees. This is optimistic as a number of the mature trees that are planned to be retained are situated extremely close to planned building footprints on the Tree Conservation Report diagrams. Nonetheless, this represents a loss of at least 27% of mature trees. Mature trees provide important social, environmental and health benefits. Research has shown that tree-lined streets and neighbourhoods have less crime and occurrences of other anti-social events. Of immense importance, in the context of climate change, mature trees are extremely important at mitigating the impacts of heat and cold. Scientists project average annual temperature increases of 3.6 degrees Celsius in Ontario by 2050 and a doubling of the number of extreme heat days per year in that period of time. Mature trees are crucial for neighbourhood level cooling. While replanting trees is admirable, these trees will not reach maturity in this time span. The loss of so many mature trees in an area that currently houses many low-income residents, including high numbers of seniors as well as families with young children is worrisome. It is the very young and the elderly who are most at risk of heat-related illness and death. Mature trees also contribute to carbon sequestration, improve air quality and provide shade, mitigating the impact of the sun's UV-B rays on people spending time outdoors, including pedestrians and cyclists. Just as important are the health (both physical and psychological) benefits of a healthy tree canopy to local residents, as well as their impact on feelings of community connection and social health. The value of a mature tree cannot be under-estimated. New trees do not replace mature trees - the benefits of mature trees take decades to accrue.
- The loss of mature trees outlined in the application is worrisome, as are areas where new high-rise buildings will have shallow set-backs from sidewalks with inadequate space for existing or new trees. It is imperative that sidewalks and cycle tracks be built and landscaped such that they will be shaded by mature trees. The footprint of proposed buildings should be set back further and protect more of the existing trees in some crucial areas of the Master Plan. Where mature tree retention is not possible the developer must allow space for provision of *large* replacement trees in these key areas. Of prime concern are areas along St. Laurent Blvd. at Brittany Avenue and along Brittany Avenue, as well as along St. Laurent Blvd. north. Furthermore, areas planned for "plazas" (i.e. along the west portion of St. Laurent Blvd. North) should be designed such that mature trees are preserved and incorporated into these outdoor areas. The environmental impact and tree conservation reports have mitigation suggestions including the use of native tree and shrub species (www.rockcliffepark.ca/Environment/trees & www.rockcliffepark.ca/Environment/native-trees-shrubs-and-vines) and 1 tree per 5 surface parking spaces, and a 40% (mature) tree canopy target is suggested. A 40% tree canopy should be the absolute minimum target for this development, especially given the massive increase in population density and number, size and height of buildings proposed. An ambitious 50-60% tree canopy target should be the goal for livability

in the context of high density and to mitigate the local impacts of climate change over the coming decades. In addition, water conservation and re-use technology must be front and centre. Porous pavement, constructed swales with mini-wetlands, and every attempt to divert rainwater back to ground must be an important part of the environmental mitigation measures, adequately described and then implemented.

- Given that the Ontario SwiftWatch monitoring program could not obtain data in 2020 as a result of COVID19, extra care must be taken regarding the at-risk (Threatened at both provincial and federal level) Chimney Swift population, known to use the chimneys in the current development for nesting habitat. Chimney Swifts in Canada have been shown to accept new nesting towers/chimneys when they are built in close proximity to existing roosting towers/chimneys or existing nesting chimneys. The MPCA wants to see new nesting towers be built at least two years in advance of exiting chimney demolition and as close to the existing active chimneys as possible but sufficiently removed from what will be an active construction zone so as to minimize disturbance during the nesting season. In Quebec a tower was built in sections by masonry students and transported in sections and assembled on site. A similar approach could be taken here – use the tower building as part of a masonry training course.



- It is possible that Barn Swallows (Threatened at both the provincial and federal level if present, could also be negatively impacted. All mitigation efforts must be employed for these at-risk bird species, as outlined in the Environmental Impact Statement and no action should proceed without obtaining updated information on current nesting of Chimney Swifts and survey for Barn Swallows can be completed within the proposed development lands.
- We have further concerns about wildlife regarding the proposed building heights and potential impacts on both local and migratory bird populations. The City of Ottawa recently adopted design guidelines to help keep birds from colliding with buildings. Bird-safe design features have been scientifically proven to lessen the risk of window collisions, reducing bird injuries and deaths. With sustainability highlighted as a key urban design principle in the Master Plan, it is expected that the entire redevelopment will commit to following the most up to date bird-safe design features that have become the standard in the City of Ottawa (https://documents.ottawa.ca/sites/documents/files/birdsafe_designguidelines_en.pdf). The current Environmental Impact Statement does not address migratory birds or risks of bird collisions (whether they be migrating birds or local bird populations) with buildings at all. This is especially notable given the significant number of 20-30 storey buildings included in the Master Plan application, as well as the fact that large areas of the redevelopment are

immediately adjacent to large urban natural areas. Birds are especially put at risk from tall buildings during the migration periods; lights emanating from the windows confuse them, and they may crash into the windows, especially on foggy nights.

- Risks of increased noise and air pollution at the neighbourhood level throughout a multi-year, and likely multi-decade re-development and construction process are particularly worrisome for current and future residents, as well as the

children and staff who attend Manor Park Public School and local businesses. Noise pollution will be significant at the school which is immediately adjacent to the Manor Park Gardens development, including constant use of pile-drivers, dump trucks and cement trucks. Similarly, noise pollution from construction will also be very impactful on the current Manor Park residents living adjacent to all the redevelopment areas throughout the neighbourhood. As mentioned, many existing residents are seniors, and even more people are at home all the time now, with work-from-home arrangements expected to remain the norm for many years to come after COVID19. The local-level expected increased air pollution from construction dust and fossil-fuel exhaust from frequent cement and dump trucks will be considerable and have a duration of years to decades. Health Canada reported 15,300 people in Canada died of air pollution in 2016. The environmental health risks of construction-related air pollution to the local community are real and the considerable size and heights of proposed buildings make these risks all the greater. In a similar vein, safety risks to pedestrians and cyclists with expected high-frequency routing of dump-trucks and cement trucks along Brittany Ave., St. Laurent Blvd. and Hemlock Road must be aggressively mitigated to prevent injury or death, not to mention maintaining a secure and pleasant environment for current residents to enjoy their day-to-day lives.

- Longer-term concerns of noise pollution from HVAC units could be mitigated by the developer committing to building zero carbon buildings as per One Planet Principles to which the master plan alludes in very general terms. This development is a great opportunity to rise to the compounding housing and climate crises by propagating new building solutions that maximize the potential to be part of a zero-carbon future. This could include high-efficiency housing, triple-pane windows, roofs built for gardens, lighter construction methods, CO2 absorbing materials, clean energy installation, and electric vehicle infrastructure. However,

Manor Park: A Bird Haven

The Cornell University e-Bird data lists a number of species identified around Manor Park:

- Beechwood Cemetery - 95 species
- Rockcliffe Park and McKay Lake - 139 Urban Natural Area No. 176 – Caldwell-Carver Conservation Area
- Rockcliffe Airport Woods -178
- The numbers drop off drastically as we go along St. Laurent towards Montreal Rd and before Brittany Drive the number drops to 75.
- Residential towers potentially would be harder on migrating birds than office towers where lights can be turned off after sunset.
- The numbers in Rockcliffe Airport Woods are high because it is where migrating songbirds stop to rest.

Jerzy Komorwski

Manor Park Resident

as it stands the current proposal will not reduce GHG emissions or improve environmental stewardship without a transparent framework and detailed targets for environmental sustainability.

o) Five Point Intersection at Manor Park School

We would like the five point intersection at Manor Park School upgraded to improve safety. To this end the MPCA has already prepared a brief proposal for consideration by the developer and the city. (See Annex 1)

p) Compensation for Tenants Evicted Under Section 50(1) of the Residential Tenancy Act

In the Master Plan, the developer is proposing that the benefits of the development outweigh its costs. This is true for the developer, who will benefit from an increased rate of return from its investment in the property, the City of Ottawa which will benefit from \$3 to \$4 in development fees for buildings 15 feet and over. It will benefit by increased tax revenues from property improvements and greater service efficiency due to densification. New tax dollars are necessary to pay for LRT debt and are unlikely to contribute to healthy densification.

Benefits will accrue to City of Ottawa residents as the development will generate significant employment opportunities through the private investment of an estimated \$2 billion. This proposition might even hold for local property owners.

This, however, is not true for the tenants living in the lands subject to development.

For the benefits of this development to be realized, these tenants will lose all enjoyment of their homes and experience the hardship of being relocated against their will. While the developer commits to mitigating these effects in the Master Plan, the developer will still have legal grounds to evict tenants who do not wish to relocate by using section 50(1) of the Residential Tenancy Act.

Section 50(1) of the RTA allows a landlord to serve a notice of termination if the landlord intends to:

- demolish the rental unit;
- convert it to a purpose other than residential premises; or
- do repairs or renovations to it that are so extensive that they require a building permit and vacant possession of the rental unit.

In order to ensure that the developer is compelled to mitigate the hardships of relocation, we propose that the following language is included in the OPA:

If the development of the lands affected by this OPA require an eviction under section 50(1) of the Residential Tenancy Act, the developer shall ensure that:

- *The affected units are replaced with equivalent units on the same site and offered to the tenants at the same rent at the time the application was made, on a right-of-first-refusal basis.*



- *The equivalent units will be considered rent controlled for the tenants of the original units.*
- *If the tenant does not wish to occupy the equivalent unit, the landlord must give the tenant an amount equal to three years' rent.*

While this language may represent significant cost to the developer, they are equitable due to the following:

- The approval of the development would significantly increase the value of the developer's property.
- The developer has already committed to being equitable to the tenants.
- The proposed language will allow the tenants to be treated equitably while sharing in the benefits of the development.
- The proposed language will avoid litigation, since tenants who do not find an equivalent unit have an alternative to legal challenges.
- The proposed language provides certainty to the developer's cost for relocating tenants - they are limited to three years of rent per unit.
- The proposed language will encourage the developer to construct equivalent affordable family units to avoid paying three years rent to unsatisfied tenants.
- The proposed language will comply with the wording found in the draft version of comprehensive Official Plan review which will cover a time period similar to the proposed development timeline.

q) Potential Community Garden

It is appreciated that the plan includes space for a potential Community Garden site. Though this is certainly a much-needed space and community resource, the preliminary shadow-studies and the proposed heights and massing of surrounding buildings may make the particular location identified impractical. Growing vegetables is optimal in spaces that receive direct south/westerly sun. The current proposed community garden site is bounded by buildings to the south and partially by buildings to the west. To the north are mature trees in the rear-yards of existing homes on Riviera Drive. There is limited value to community garden space that is almost entirely shaded. We assume more suitable places for community gardens can be found.

4. Aspects of the Proposal That We Support

It is important to note the proposals made by the developer that we are in support of. These should be further explored if an opportunity is provided to substantively reconsider the application and the future development of the neighbourhood.



Welcoming Smart Design

Congratulations on the initiative to redevelop the area and especially to seek input from the community. Consultation is critical for such large scale, once in a lifetime, long lasting development, and you certainly want to get it right.

...The proposed development is an opportunity to do something visionary and that would be a legacy for you, for the neighbourhood and the city. Ideally it would become an area that not only non-Ottawa planners would flock to see, but even tourists and other visitors to Ottawa. To that end, inspiration should be drawn from other communities in the world in a novel, environmentally friendly and esthetically pleasing manner.

Eric Janse and Volaine Trottier

Pilot Project for the New Official Plan

We hope that this will allow the city, the developer and other stakeholders to come together in a deliberate process that brings together all the services required for a 15-minute neighbourhood. The process should be accompanied by an evaluation team to ensure learning is evidence based and shared with other communities in the city.

Prioritisation of Current Residents

We appreciate and support the principle as outlined in the proposal that the development will take place in a manner so as to be able to accommodate all the existing residents with the least amount of disruption and relocation.

Improved Links to NCC Lands

We appreciate the statement on improving links to the NCC land and pathways. While this can provide much needed access to these open spaces for walking and cycling, this is not a substitute for parks and other amenities. However, it is a pleasing component of the development proposal and one that we support, but more detail needs to be provided.

Consultation and Moving Forward

We would like to thank the Planning office for the opportunity to provide comments on this development proposal, which is at a scale such that it would have a profound impact on Manor Park as a community, as well as all its residents. This process has stimulated much conversation in our neighbourhood as has the Draft Official Plan. (See Annex 2). We know there is grave concern on the numerous points that we have outlined in this letter. The potential for one landowner to so drastically alter the shape of a community must be met with all due caution and oversight from the City. It is vital that a move forward with any development be done with conscientious and meaningful consultation with the community.

We do appreciate the Mr. Aggarwal's extraordinary efforts to reach out to the broad community since the OPA was tabled. We look forward to seeing the conversations with the community



appear in changes to the plan as presented in the OPA. MPCA looks forward to constructive dialogue as we move forward.

Jennifer Keesmat

Urban Planner and Former Chief of Planner for the City of Toronto

Fear and anger over what more intensification will bring to communities have dominated the dialogue in recent months as Ottawa develops its Official Plan. These concerns are legitimate because the municipalities have done a poor job of managing intensification in the past. Incremental density ...the *missing middle* that does not tower over communities is the key to future of the cities.

Précise of Ottawa Citizen Article

See Below Annexes 1 and 2

ANNEX 1: 5 Way Intersection - 2

Charl-Thom H. Bayer

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Transport Design Problem Identification

By

C-T. H. Bayer

Objective

This brief report identifies and critically evaluates the transport engineering problems/deficiencies of the a five-way intersection that require some form of improvement in order to meet its intended operational objectives.

1. Site Selection

The site under consideration for improvement is i) a five-way intersection situated on the corner of the Manor Park Primary School grounds and the residential neighbourhood that surrounds it, ii) as well as the lack of pavement for safe pedestrian travel on the section of Eastbourne between St. Laurent Blvd and the five-way intersection. The intersection is formed by Eastbourne Ave that runs East-West along the northern boundary of the school grounds, Braemar Street which runs roughly North-South along the eastern boundary of the school grounds, and finally Ava Road, which runs in a North-Westerly direction from the intersection. The School has a student population of about 700 children from grades JK to Grade 6.



Figure 1: Locality Sketch of Five-Way Intersection

The site is very busy with school drop-off taking place on the northern boundary of the school, as well as pedestrians and cyclist who walk or roll their children to school. The neighbourhood also has a significant number of senior residents (65 + years), constituting 25% of the neighbourhood population (CRECS, 2020).

A significant number of children are bussed in to the school as it offers French emersion. This means that there is significant school bus traffic to the school. The school busses use the five-way intersection to reach the school. The busses traverse the intersection from the east and west via Eastbourne and turn into Braemar and exit from Braemar onto Eastbourne Avenue.

2. Problem Description

The intersection has a number of characteristics that are generally considered to be undesirable, and should be avoided if at all possible. Below is a schematic representation of the key features of the current intersection, showing the raised islands, pedestrian crossing and intersecting roads.

A second problem is the absence of sidewalks along Eastbourne Avenue, on the section between St. Laurent and the five-way intersection.

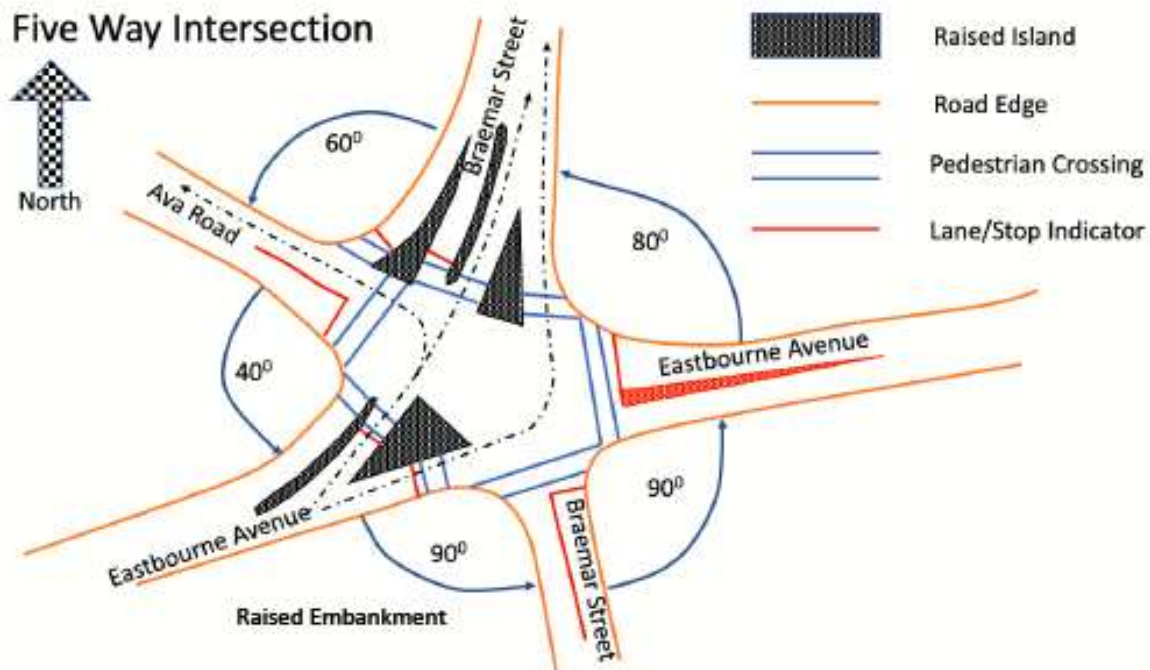


Figure 2: Key Features of Current 5-Way Intersection

a) Multi-Leg and Multiple Lane Intersection Type

Multileg intersections are seldom used and should generally to be avoided if at all possible. They are sometimes found in urban areas where traffic volumes are light. Multiway intersections generate conflicting movements and impair safety and efficiency. The use and placement of the raised islands generate dual lanes exiting Braemar from the North, dual lanes exiting Eastbourne from the east and dual lanes when entering Braemar to the North. This creates confusion as to which lane is the correct one to use. For one example of the possible confusion, see the dashed arrows indication direction of travel and note that there are two possible lanes that could be seen to be entering Braemar from Eastbourne Avenue in Figure 2. Generally multiple lanes are not recommended for a multi-way intersection. The narrow islands become virtually impossible to see during the winter, creating very narrow lanes for egress and entry.

b) Narrow Intersection Angles

It is generally recommended that all intersection roads should ideally meet at right angles or as close to a right angle as possible. The minimum intersection angle that may be acceptable is generally recommended to be no less than 75° where older drivers have to be accommodated. Older drivers have significantly more problems at skewed intersection, and given the significant older population in the neighbourhood this is a significant consideration. The main problem is that two of the intersection angles in this 5-way intersection are 40° and 60° respectively, less than the recommended minimum of 75° .



Figure 3: Mural Warning of Dangerous Intersection.

c) Difficulties for Pedestrians

The confusion for drivers creates difficulties for pedestrians as well. They are directed onto islands, creating multi-directional crossing lanes. Two of the islands are only about two feet in width, creating an insufficient safety zone for pedestrians, and in winter, it is basically invisible and inaccessible. Anticipating the vehicle intention is difficult, because for a vehicle indicating a turn, more than one option is available in some instances.

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ANNEX 1: 5 Way Intersection - 2

d) Poor Visibility (Intersection Sight distance)

The intersection sight distance is limited in several directions. The school ground (baseball diamond) form the southern corner and is basically a raised embankment about 2 metres higher than the street level of the intersection, reducing visibility between when exiting Braemar from the south and when exiting Eastbourne from the east.

e) Lack of Sidewalks (Impaired Pedestrian Safety)

The section of road along Eastbourne avenue is used daily by kindergarten and primary school children and their parents to walk to school. There are no sidewalks on this section of the road, and combined with on street parking and that this is a school bus route, there is very little room for pedestrian and they are forced to walk in the road. This situation is exacerbated in the winter with the accumulation of snow and ice banks that funnel pedestrians into an ever-narrowing roadway with car and bus traffic and on street parking.



Figure 4: Photo of schoolchildren forced to walk in busy section of Eastbourne Ave and 5-Way Intersection.

The photo above clearly illustrates the risk for school-going children on the section of Eastbourne Avenue. The children have to walk in the road, pass a parked vehicle on the road verge and a few seconds later there is a vehicle coming from behind, being forced into the opposing lane. In the distance we see a school bus approaching from the 5-Way intersection. While the children are on the right-hand side of the road, and trying to get to the other side, it illustrates the danger caused by the absence of pavements for safe pedestrian transport along this section of the road.

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ANNEX 1: 5 Way Intersection - 2

There are no pavements for the pedestrians, so they share the roadway with vehicles, creating a very busy and unsafe environment for all.

The problems as summarised here create for a dangerous intersection and an unsafe stretch of road that is not very safe for pedestrians and especially the school going children in the neighbourhood.

In order to highlight the dangers of this intersection and draw attention to their safety concerns, they community over the years has maintained a mural on the intersection.

3. Historical Background

The intersection is first visible as rural road lines in 1929, (See Figure 5) when this was a largely rural and agricultural area with very few people. The neighbourhood of Manor Park was developed after the Second World War and by 1959 (See Figure 5) we see the first design of the intersection resembling the form that it currently has.

The volume of vehicular traffic on the road in 1958, or prior to that when the intersection was first designed was much less that it is today. As such the problems regarding the intersection have now been magnified with increasing traffic, and it's relative proximity to the centre of the city. With infill densification it is expected that the population of the community will double again in the next twenty years. This has meant that the relatively quiet rural multi-way intersection has changed into a rather busier multiway intersection in a fast-developing neighbourhood that has been classified as belonging to the inner urban development transect of the City of Ottawa. Given the current and future expected growth trends for the neighbourhood, it is advisable that the design deficiencies of the intersection be remedied.



Figure 5: Intersection 1929



Figure 6: Intersection 1958

4. Remedy:

In order to address the issue of pedestrian safety, it is recommended that the section of Eastbourne Avenue between St. Laurent and Braemar reconstructed to include sidewalks for pedestrian use (including many school going children and their parents) separated from the roadway by a pavement and on street parking. The on-street parking may have berms (indentation) that project inward to serve as a traffic calming measure and accommodate the vehicles that currently park on the street.

The addition of sidewalks, in conjunction with the replacement of the five-way intersection with a roundabout is proposed as a possible remedy for the deficiencies listed above. Research has shown that roundabouts improve the efficiency of traffic flow, reduce vehicle emission and conserve fuel (Mujahid, 2012). Roundabouts are cheaper to maintain than intersections with traffic lights. A research study by the Universities of Ryerson and Maine found that roundabouts are also much safer for vehicles and pedestrians, confirming the results of international research (Persaud, Retting, Garder, & Lord, 2000). It has been shown that roundabouts improve safety through yield at entry operation, having pedestrians cross traffic in only one direction at a time and having fewer conflicting points than 5-way intersections (Transportation Association of Canada, 2011). In Ottawa "roundabouts have emerged as an alternative to traffic signals or all-way stops for traffic control at intersections, particularly in new residential subdivisions or in locations where traffic signals are not warranted" according to the City of Ottawa (2020). It is argued that roundabouts offer many advantages over traditional forms of traffic control provide a traffic calming function, and enhance the streetscape by providing additional landscape opportunities and visual focal points along a road corridor.

Urban Single Lane Roundabout

Characteristics may differ across jurisdictions, but generally urban single-lane roundabouts may be defined as being of medium size (Transportation Association of Canada, 2011). They are



Figure 7: Area, Radius and Perimeter of Intersection Site.

typified by having a single-lane entry at all legs and a single circulatory lane. They have an inscribed circle of between (30 to 40 m) in diameter and may have more tangential entries and exits. The design of single-lane allows slightly higher speeds at the entry, on the circulatory roadway, and at the exit, although not recommended for this particular roundabout. The roundabout should be on a flat area, rather than on the crest of a hill. The geometric design includes raised splitter islands, a non-mountable central island and sometimes an apron. This site is suitable for an urban roundabout and can accommodate the geometric requirements. The maximum diameter of the site is about 54 m as shown in Figure 6. The site can accommodate the

maximum inscribed diameter of 40m and still have an outer ring 7m wide for pedestrians, trees and to ensure an appropriate reserve to the property boundaries.

Category	Inscribed Diameter (D) (m)	Environment	Recommended entry speed (km/h)
Mini-roundabout	12 to 24	Urban	25
Small roundabout	24 to 30	Urban	25
Medium roundabout	30 to 40	Urban	35
	34 to 50	Rural	40
Large roundabout	40 to 54	Urban	40
	50 to 60	Rural	50

Figure 8: Roundabout Categories (Source: TAC 2011)

This inscribed diameter will be able to accommodate school busses as well as emergency vehicles. The recommended entry speed might have to be lowered to 25 km/h as for a small roundabout due to the proximity to the school and pedestrians. To create more space for pedestrians, a smaller roundabout may be considered with a traversable centre island.

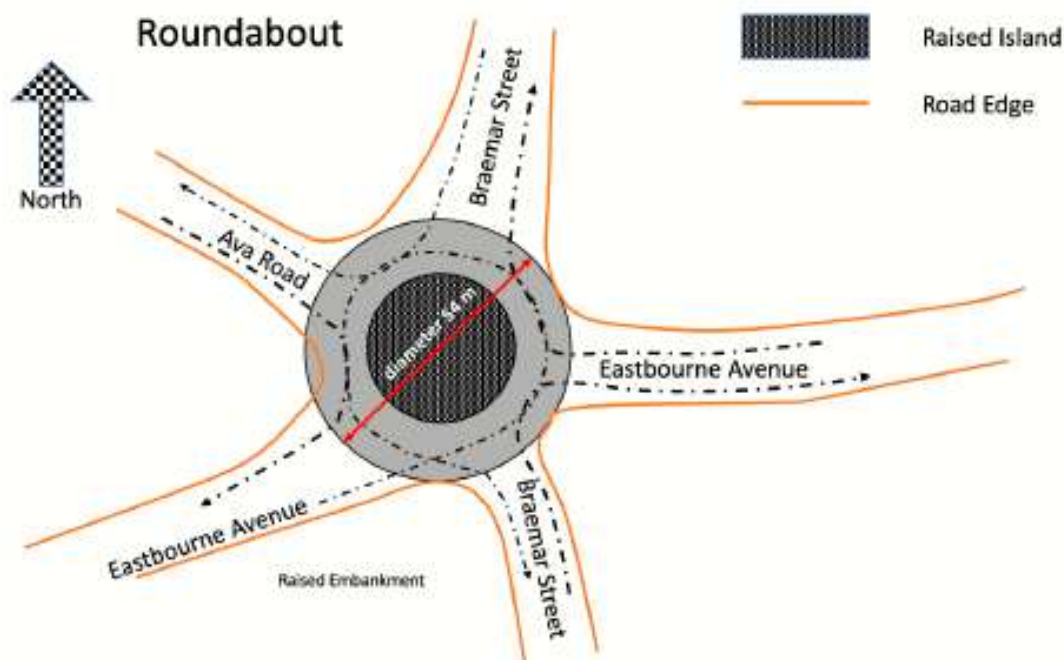


Figure 9: Sketch of Proposed Roundabout.

The proposed roundabout is shown in Figure 9. It should remedy most of the shortcomings that have been described. The large centre of the intersection can be planted with grass or other permeable cover to reduce water runoff. It could also be used to accommodate the mural in some form as the mural has become something of a trademark in the community. Note that the

approach angles have not been adjusted in this sketch as it is not a roundabout design, but rather serves the purpose of demonstrating that a roundabout can be accommodated on the site and is worthy of consideration.

Factors that might hinder the construction of the proposed remedy include the costs of construction. The cost of construction would be significant. The area is already built up and care must be given to locate the property boundaries and the spatial extent of the reserved right of way. Underground services must be located and stormwater drainage for the site will have to be considered, adding to the complexity and the cost of the task at hand. There are likely to be gas lines underground seeing as there is residential housing on four sides of the intersection. The approaches to the roundabout already show much better articulation than in the 5-way intersection, but the approach angles of the entry and exit to the roundabout will have to be re-aligned. A survey of the surrounding properties and the road right of way will provide more information that needs to be considered in determining the feasibility of the proposed remedy. The outcome of the survey could be an impediment to remedying the situation as the reserved right of way for the roads need to be re-aligned and surveyed.

The purpose of the sketch and short report is only to demonstrate the safety issues that result from the current 5-way intersection and lack of pedestrian pavement this section of Eastbourne Avenue. Secondly it shows that the size of the intersections is sufficiently large to accommodate a roundabout, (and enjoy accompanying benefits) that can accommodate a standard school bus, instead of the current 5-way intersection.

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ANNEX 2: Comm Collective Comments on DOP to Miguelez-2021-02-24

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

Copy to: jim.watson@ottawa.ca; rawlsonking@ottawa.ca; mfleury@ottawa.ca; newop@ottawa.ca;
Stephen.Willis@ottawa.ca; 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

ANNEX 2: Comm Collective Comments on DOP to Miquelez-2021-02-24

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.

ANNEX 2: Comm Collective Comments on DOP to Miquelez-2021-02-24

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.

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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

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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 is 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