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Subject: Comments on R4 Zoning Review

Purpose

The proposed document is to register the comments and concerns of the Vanier Community Association regarding the proposed *Discussion Paper #3: Draft Recommendation – November 2019* amending regulation for the proposed R4 Zoning Review.

The Vanier Community Association (VCA) welcomes the effort of the City of Ottawa to update the zoning regulations in order to address the current housing needs of the residents of the City of Ottawa. In this discussion, we acknowledge that the vacancy rate in Ottawa is seriously low, housing affordability is decreasing and there is a need to suitably intensify to respond to the influx of population in the next decade. We are delighted to be able to contribute to this discussion with the idea that we want to contribute to a healthy, inclusive and safe environment for all residents of

Vanier. To that effect, we have made a significant effort to review and comment on the proposed amendments for the R4 review.

Summary

A City of Neighbourhoods Approach

- Reflect thinking in proposals for the new Official Plan
- Adopt a neighbourhood-based approach to establish R4 sub-zones in a City of Neighbourhoods
- Take into account existing level of neighbourhood intensification (Vanier more than 6,000 residents per square KM), local existing and future housing supply, demographic trends, existing and future limits to green space and access to services and public facilities.
- Take into account existing intensification planning in other neighbourhood zones. In the case of Vanier, the Montreal Road District Secondary Plan removed former limits on residential development (30%) providing significant additional local scope for residential intensification on its 3 traditional main streets.
- Adjust minimum lot size/width to these neighbourhood factors.
- Ensure diversity of housing choice, including subsidized housing, and provision to take into account neighbourhood and street characteristics in a holistic manner.

Vanier zoning pre-amalgamation

Following amalgamation, Vanier's by-laws were incorporated into a revised city-wide zoning including for the R4 residential zone. Under the Vanier zoning bylaw R3 R4 and R5, provision was made for a wide variety of housing form, not just apartments, as staff claim is the intention of Ottawa's R4 zone. The Vanier R3-R5 provisions under its zoning bylaws were/are accordingly consistent with the Provincial Policy Statement (PPS) to ensure the availability of housing choice for residents. The Vanier R3-5 zones were adapted into 4 Ottawa R4 sub-zones: R4B R4E R4M and R4O.

As Vanier is now almost exclusively R4 with no provision for R3 anywhere in the former city, provisions to ensure housing diversity in the R4 zones in Vanier are critical to maintain built heritage and street character. The availability of a variety of housing choice is also consistent with the PPS. Vanier zoning bylaws provided for a minimum frontage of 15 metres for apartment buildings to ensure such diversity and this was incorporated in the Ottawa bylaw. In its wisdom, the City of Ottawa increased the minimum frontage to 18 metres at the time for 1 Vanier sub-zone, consistent with its practice in other Ottawa neighbourhoods, to reflect the character of the area and to ensure diversity of housing choice.

Moreover, pre-amalgamation Vanier residential zoning made provision for apartment buildings for minimum size of units, including a minimum size for each bedroom in the unit. This reflected

an effort to improve housing conditions in the densely populated then city located in the inner urban area with relatively limited green space and public facilities. The situation has deteriorated since amalgamation with public spaces, formerly financed by the City of Vanier no longer available and no replacement by the City of Ottawa. Concerns were expressed about the impact of the R4 review recommendations on unit size at the recent Hintonburg/Mechanicsville Community Associations public meeting.

While we support intensification goals, additional green space and public amenities must be added to meet existing and future demand. The VCA welcomes the Planning Department efforts to see this addressed and looks forward to progress being achieved. Suitable green spaces, formerly public lands are available on the market and the City should pursue these opportunities in addition to resuming public access to school board properties on the basis of an agreement with school boards. School boards should be reminded of the Ministry of Education guideline on public consultation on public access.

R4 review

The Vanier Community Association is encouraged that City Planning acknowledges its role to ensure that new low rise apartment buildings meet critical standards such as provision for green space, affordability, “context-sensitive design” (7) and integration into an existing neighbourhood like Vanier - more than 110 years old with some 40 properties listed on Ottawa’s heritage register and others on the heritage designation list. We welcome efforts by City Planning staff to address issues related to R4 zoning, which covers most of Vanier, including in R4 Zoning Review I and Review II as the City manages - intensification consistent with the Official Plan and the Provincial Planning Statement. We have been given to understand that similar reviews will be taken with respect of other residential zones in the context of intensification. Low density zones must be considered carefully in the context of appropriate intensification. The study’s argument (page 7) however is invalid for Vanier. The distinctions introduced following amalgamation are not considered “trivial”, nor has Infill II been implemented yet for Vanier.

There must be a clear definition of “context-sensitive design” in the document, and stronger language to reaffirm the City’s commitment to **systematically** take into consideration neighbourhood characteristics, including to ensure that Vanier is covered by the new Infill II provisions. We note that the proposed zoning amendments would generally double the existing limit per low rise apartment development, and in many cases more throughout Vanier. The VCA supports this, subject to the retention of at least 15-meter lot frontage for low rise apartments. We think a reduction to 10 meters would lead to substantial change in street character, loss of green space and diversity of housing choice. The VCA can accept a reduction from 18 meters minimum lot frontage in the affected sub-zone as a suitable compromise in support of intensification. According to City staff, in what are currently the R4B and R4E zones that cover most of Vanier, the current zoning allows low-rise apartments on about 15-20% of lots. The proposed changes would allow eight-unit buildings on about 60% of the lots in the current R4E and about 70% of

lots in the current R4B. The VCA believes this would be excessive given the limited green space, public amenities and the PPS to offer residents a diversity of housing choice, in addition to take into account street character. Moreover, we have already seen City staff recommend that Council over-rule community objections to spot rezoning of R4 in favour of a mid-rise apartment building, rejecting streetscape character analysis and development requirements to integrate new developments into the immediate neighbourhood. This spot zoning decision risks a precedent in the rest of Vanier's R4 zoned areas. In many cases, this example would potentially lead to more expensive mid-rise developments in current R4 zones, defeating affordability objectives and drastically affecting the current streetscape character of Vanier.

In additional, the VCA is concerned that the *Discussion Paper #3: Draft Recommendation – November 2019* does not refer to the “local demography” to discuss types of units and housing, while taking into account the need for maintaining housing diversity. Vanier is a demographically diverse community, with a large segment of population being seniors. Canadian population is aging; therefore, planning needs to take into consideration long term demographic changes and trends in its recommendations. It is crucial that the housing markets responds to the local needs of the community, but also respond to the need of tomorrow's population demographic, including children. The City of Ottawa needs to study the impact of intensification on the well-being of children. While thoughtful, high quality high density offers opportunities to improve children's health and development, these opportunities need to be proactively and explicitly planned for in order to avoid the potential harm from careless high-density development.

The VCA does not believe that there is compelling evidence to prove that the proposed recommendations will lead to more affordable housing. In the *New Official Plan – Discussion Paper: Affordable Housing: Appendix A* published in March 2019, the CMHC Rental Market Reports highlights that the average rent of a two-bedroom unit in 2018 was 1,297 dollars per month in the Ottawa-Gatineau area. In the *Discussion Paper #3: Draft Recommendations on November 2019*, the City has established that a typical rental unit would be rented for “as little as 1677 dollars a month” (20), thus the expected rental for a “typical” new unit will be at minimal 380 dollars, higher than the average rental in Ottawa/Gatineau area, without considering inflation and market forces.

The Vanier Community Association supports an increase of affordable rental supply in our community, but we are concerned about the loss of affordable housing due to short term rentals, infill development with higher rent costs, and the City's temporary shelter practices. We are also concerned that there may actually be a further loss as a result of the proposed amendments. Finally, in the absence of other supporting measures to ensure developers deliver affordable housing, the City of Ottawa must clarify what kinds of affordability targets it is seeking to achieve and how this will be accomplished.

We strongly ask that the diversity and the affordability of the Vanier housing market be preserved, including various forms of housing such as cooperative (eg. Jeanneville Coop), and townhouses to ensure other forms of housing are available in the context of affordability and offering housing choices to families and seniors. The review proposes to convert the sub-zone covering such denser developments (R4O) to R4-UU zone in which 4-storey apartment buildings would be permitted without a ceiling on the number of units. The VCA believes there should be a limit to about 16 units to ensure more family accommodation is available. There is also a risk that existing low-rise apartment estates, which in Vanier often represent green, well-treed and long-time communities, would be replaced by less affordable developments with smaller units excluding families. Again, as noted above, the City has already revealed a willingness to approve spot zoning that favour less affordable mid-rises.

The VCA is very concerned with the risk of reduction of greenspace and trees in the *Discussion Paper #3: Draft Recommendations on November 2019*. The Vanier community Association does not believe that the proposed setback (pp 12/13) is in accordance with the City of Ottawa's Forestry Department policies and supports irrespective of SCA that front setback for low-rise apartments and other development be a minimum of 6 meters. The Forestry Department requires a setback of 1.5 m from sidewalks for deciduous trees and 4.5m setbacks from sidewalks for evergreen with adequate rear and side green space. In addition, the proposed amendments suggest to "remove the 30% landscaping requirement for small low-rise apartment dwellings on small lots" (8 meters). This will clearly result in the loss of greenspace. In a state of climate emergency, trees play a critical role at decreasing temperatures in cities and reducing GHGs. It is important to add that the conservation and the protection of urban biodiversity is fundamental to ensure the survival of the urban fauna as they provide critical habits to numerous urban species (birds, squirrels, racoons) for breeding, shelter, and food. Please note that the loss of trees and greenspace would be contrary to the policy direction of *the Official Plan - Big move 4 – Climate, energy and public health*. The City recognized the important to protect "tomorrow's urban forest and growth that forest through smart planning and planning" (15), thus the proposed amendments need to align with the O.P and its policy direction. The loss of greenspace and smaller setback would limit the number of trees on each property, and further jeopardize an already endangered tree canopy in Vanier. The Tree Canopy Assessment published in the Fall by the National Capital Commission, the City of Ottawa and the City of Gatineau, clearly demonstrates that Rideau-Vanier's tree canopy is less than the region's average (27% / 40% regional average). The Vanier Community Association asserts that the City needs to invest in green space if it intends to move towards urban densification. We recommend that consideration be given to providing clear minimum requirements for greenspace as well as protecting the existing green space on existing lots and properties.

In conjunction with the loss of greenspace, a robust set of international academic research demonstrates that lack of access to green spaces and urban densification are correlated to a significant increase in depression and schizophrenia, anxiety and stress in individuals living in densified neighbourhoods (Kirkbride, 2014;2016 ; Meyer-Lindenberg, 2010). The Vanier

Community Association recommends the City of Ottawa engages in an aggressive urban parks, tree and greenspace protection strategy, and ensure appropriate greenspace at the front and the rear of the properties.

Even though the Vanier Community Association welcomes the City's intention to strengthen City's efforts through Building Better Revitalized Neighbourhood (BBRN), OPS Neighbourhood Teams, and the Integrated Neighbourhood Teams, these fall short of capital and program investment required. Urban densification calls for greater investment in recreational, cultural and social infrastructures and programs (e.g. programming at local community centre, health and social services, day care, community facilities) to better serve a densely populated neighbourhood, given the lack of resources in pre-amalgamation of Vanier. We recommend the City of Ottawa takes a holistic approach to planning by taking into account transit, amenities, and access to social, cultural, and health services.

The VCA is concerned that the expected size for a "typical two-bedroom apartment is very small (number of units vs. size of housing) and is not conducive to a healthy living environment. We recommend that adequate provision is made to ensure that each unit size have a minimal size imposed, and additional zoning provision is made to include larger apartment to accommodate families, supporting the need to maintain minimum 15m width to permit a larger footprint while providing greenspace. This will ensure diversity of unit type (especially for the proposed R4-UU Zone). As noted above, the former City of Vanier applied minimum unit sizes in apartment buildings.

The VCA believes that suitable design is important and supports City efforts to develop design guidelines (e.g. fenestration, eyes on the street with street-facing entry and balconies, and articulated frontage). Such design promotes "eyes on the street" which is important for the community and its development, especially in a high crime area like Vanier. The VCA also believes that street character should be taken into account in permitting increase in the number of low-rise apartment buildings which a limit to a minimum of 15 meters frontage would provide an effective tool. The VCA awaits confirmation when Infill II and its update will be applied to Vanier.

The VCA strongly opposes the removal of site plan control and does not believe that "some consideration should be given to streamlining the Site Plan Control process for smaller buildings" (22), for the reasons stated in this document. Therefore, we welcome the decision to drop the proposal to eliminate site plan control and confirm our understanding that all low-rise apartment buildings and other similar denser developments will be the subject to site plan control.

Additional comments

As the city considers urban densification, the Vanier Community Association asked the City to improve its communication strategy with Community Associations. In the past few months, the responsibility has fallen on Community Associations to look for information on Dev Apps. Dev App is a not a user-friendly tool and does not immediately flag new developments. Therefore, the

VCA asks the City of Ottawa to review its communication strategy with the purpose to better engage and inform community associations about upcoming developments. We propose that the City of Ottawa resume notification of site plan control applications in R4 and other zones and improve Dev Apps to ensure information is easily accessible.

The proposed *Discussion Paper #3: Draft Recommendation – November 2019* does not address the issue of Renoviction. The Vanier Community Association worries that changes to R4 zoning will enable developers to evict residents on the simple basis that the building is going to be renovated or replaced (as noted above). In an article published on December 30th, 2019, CBC reveals that renoviction are on the rise in Canadian cities including Ottawa. We recommend that the City of Ottawa works with local Community Associations to increase scrutiny and raises awareness about existing laws and regulations protecting tenants from renoviction.

Conclusion

The Vanier Community Association argues that the *Discussion Paper #3: Draft Recommendation – November 2019* does not provide enough evidence that the proposed R4 zoning amendment will increase the supply of affordable housing in the city of Ottawa. Looking at the new Official Plan, we believe that the City of Ottawa and the Municipal Council need to take a holistic approach in reviewing R4 proposals including early investment in greater greenspace, public services and transit. It is important to note that we strongly oppose the proposed amendment to “remove the 30% landscaping requirement for small low-rise apartment dwellings on small lots” (15). Instead, the R4 zoning review, and the general emphasis on urban densification requires that the proposed zoning amendment efforts be accompanied by appropriate measures to improve the current Tree Canopy, and access to greenspaces, transit, amenities. Furthermore, it is not evident how the zoning process is linked to other initiatives to ensure that the proposed intensification does not degrade the quality of life of residents. The VCA does support some of the amendments to increase densities near transportation hubs, encourage suitable design and improve building façades, but above all, the VCA supports appropriate intensification through R4 revisions which take into account current Vanier situation with respect to Vanier’s zoning history and character, and development that support the quality of life of our residents.

The Vanier Community Association would like to thank you for the opportunity to comment on R4 Zoning Review.