



June 6, 2025

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Dear Mr. Fu:

Subject: Further Consultation Required for Proposed Official Plan Amendments (OPA) to the Old Ottawa East Secondary Plan (OOESP) and Recommended Changes (OPA Application # D01-01-25-0001)

Despite the sound efforts of Councillor Shawn Menard and City staff to revise what the City staff originally proposed to make the Old Ottawa East Secondary Plan consistent with the 2024 Provincial Planning Statement (PPS), we – like the Federation of Citizens' Association - object to the changes that have been proposed to a number of secondary plans without there being meaningful community consultation.

The OOE Community Design Plan and the resulting Secondary Plan took about five years to craft, involved many parties, and resulted in plans to substantially increase the intensification of OOE while strengthening the community. Subsequently, the Old Ottawa East Community Association endorsed the Lees "transit-oriented development" plan, covering the northeastern portion of OOE, which also added significantly to plans for intensification. Over the last decade, the intensification targets of the secondary plan have been achieved for much of the designated areas.

Now, with minimal consultation, City staff are proposing to obliterate the height limits of the OOESP. This is all being done in the context of Official Plan amendments required to ensure compliance with the Provincial Planning Statement 2024.

The Old Ottawa East community understands the need for much more housing. But that is exactly what has been achieved through the existing secondary plan and what will be substantially augmented by the new Official Plan policies and the related zoning by-law changes. The greater heights that staff are now proposing to supposedly make our secondary plan compliant with the PPS are excessive. We strongly believe greater density is possible at Lees station, including on some the lands that were removed from

the AVTC, and at the nearby Hurdman station, yet the City has done very little to actually promote greater density in these two locations that are well served by LRT even though the City and the federal government own much of the undeveloped land and have approved the necessary heights, etc.

For communities such as Old Ottawa East, secondary plans are intended “to establish more detailed policies to guide the growth and change” in the community. These detailed policies aim to improve the quality of life within the community, one of the fundamental goals of the Official Plan.

Planning decisions must not be just a matter of how many more dwelling units can be squeezed in. Community building, trees, amenities, climate change and other factors are also critical considerations. City staff and Councillors have discretion in how they apply the PPS. In the case of the OOESP, we are of the view that considerably more discretion should be exercised, especially in light of the success achieved through the original OOESP and subsequent approved OPA's.

When Main Street was reconstructed as a complete street in 2017, developers had the concern that the lane reductions would prevent them from building what had been planned on the eastern side of Main Street. In response, City Council provided assurance that the reduced capacity of Main would not result in the approval of fewer units than had been targeted in the secondary plan. However, to now add many more units to Main Street buildings and to redevelop Saint Paul University as a nine-story residential complex - as City staff is recommending - may make Main Street almost impassible at peak periods.

Notwithstanding the need for greater consultation, OOECA recommends several changes to what is now proposed (Attachment 1) We request that these recommendations be presented in the Staff report provided to the Planning and Housing Committee. Attachment 2 sets out what we regard as factual errors in what has been included in the draft schedules that staff provided to us.

Yours truly,



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A/Chair, Planning Committee
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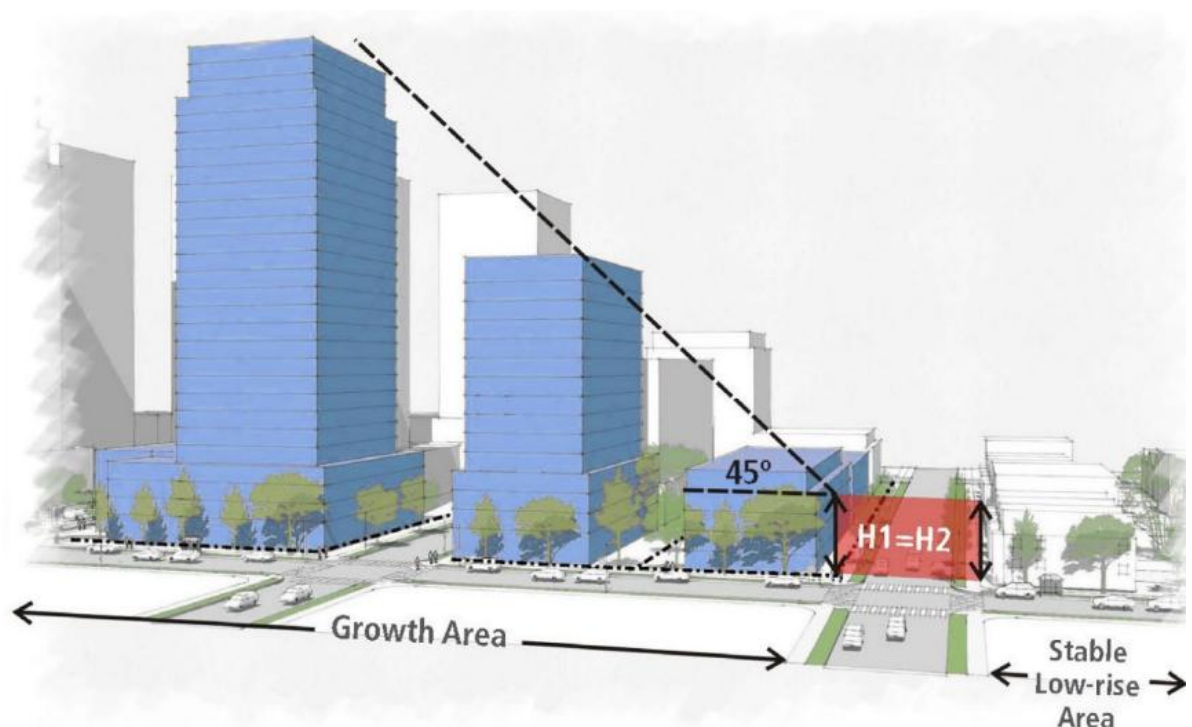
Cc: Councillor Shawn Menard
Robert Gordon, President OOECA

Attach.

Recommended Changes: Proposed OOESP “Schedule B – Maximum Building Heights”

1. Main Street (Hazel – Clegg), East Side: Saint Paul University Campus

- Proposed: all nine storeys.
- OOECA: Yes, except six storeys along Main Street to a depth of 40m.
- This block – currently Saint Paul University (SPU) – has more potential for additional jobs and dwellings than all other areas of the OOESP. We support the recommendation for 9 storeys, except for the front 40 metres along Main Street.
- We suggest and recommend the eastern side of Main Street should mirror what staff are proposing for the western side of this section of Main Street, as per the current OOESP Schedule A.
- The OP speaks about lots that front on segments of streets whose right-of-way is narrower than 30 metres, as generally being up to 9 storeys, except where a secondary plan specifies different heights.
- A six-storey height limit for the Main Street adjacent 40 metres will provide for a transition to the higher nine storeys behind, just as City staff endorsed for the height transition in the adjacent Greystone Village. Note the “lot depth” for the SPU campus is 150 metres, meaning there would be 110 metres of depth for nine-storey buildings over a distance of 235 metres, about 2.5 ha with another 1 ha with six-storey buildings in the front 40m of the lot. This is enormous potential and would be a profound change to the centre of Old Ottawa East.
- A key reason for keeping the buildings fronting Main Street at six storeys is the Official Plan Subsection 5.2.3 2) c) which states: *“In all cases: i) **The wall heights directly adjacent to a street... shall be proportionate to the width of the abutting right of way, and consistent with the objectives in the urban design section on Mid-rise and High-rise built form in Subsection 4.6.6, Policies 7), 8) and 9); and ii) The height of such buildings may be limited further on lots too small to accommodate an appropriate height transition.**”*
- Furthermore, OP Subsection 4.6.6 is titled *“Enable the sensitive integration of new development of Low-rise, Mid-rise and High-rise buildings to ensure Ottawa meets its intensification targets while considering liveability for all”* and Subsection 4.6.6 included a *Figure 15*, which illustrates the intent of the OP and the current OOESP policies (reference the below Figure 15 illustration from page 104 of the OP).
- The above rationale also applies to and for all of the proposed changes to the Mainstreet Designations elsewhere on the east and west sides of Main Street north of Clegg.



“Enable the sensitive integration of new development of Low-rise, Mid-rise and High-rise buildings to ensure Ottawa meets its intensification targets while considering liveability for all.” (Figure 15 from page 104 of the OP)

2. Main Street Side East (Grande Allée to Hazel) Saint Paul University – “155 Main”

- Proposed: nine storeys.
- OOECA: Six storeys bordering Main and eight storeys behind, as was recently built on the other side of the Grande Allée.
- The symmetry of building heights along the Grande Allée is very important. To have a ‘lopsided’ building along the south side of the Grande Allée would diminish the cultural heritage importance of the Grande Allee Park.
- Within Greystone Village, to the southeast of the new eight-storey building Regional Group has built, are, as is appropriate and approved, three nine-storey buildings, similar to what could be built on the SPU Hazel-Clegg property, as above.

3. Main Street, East Side (Springhurst to Grande Allée) Greystone / Corners on Main – “175 Main”

- Proposed: nine storeys.
- OOECA: six storeys on Main Street with four storeys facing Springhurst Avenue to provide appropriate transition to the low-rise properties on the north side of Springhurst. This is what has been recently built.

4. Main Street, East Side (Hawthorne to Springhurst)

- Proposed: nine storeys
- OOECA: six storeys.
- The ROW in this area is only 20 metres.
- This is the most bottle- nosed / congested / pedestrian unfriendly area of Main Street.
- Appropriate transition to the low-rise neighbourhood to the east and sensitivity to Lady Evelyn School are issues to be considered.
- The canyon-like feel is not desirable nor livable.
- The OP does not condone this level of intensification., as noted above in the discussion of the changes proposed for the Hazel – Clegg portion of the Saint Paul University Campus.
- Also, there is the concern that developers will want to be able to build nine-storey structures up to the 7.5-metre rear yard setback. This would require an Official Plan Amendment or a zoning by-law amendment unless the developer incorporated step backs. Should Council not approve the requested amendments developers could appeal the decision to Ontario Land Tribunal, which generally rules in favour of developers for such cases.
- If a nine-storey building was that close to the existing properties, there would be considerable shading on neighbours - on both the east side and the north side. Some would not see much sunlight in the winter aside from early in the morning.

5. Main Street, West Side, Graham to Immaculata High School + South Side of Graham (includes the Ottawa-Carleton School Board Properties and Two Churches)

- Proposed: all of these institutional properties would be nine storeys.
- OOECA: The south side of Graham should not exceed four storeys except for the Main Street properties which should be six storeys.

- If the nine storeys were approved for the south side of Graham, the residences on the north side of Graham would be between them and six-storey buildings behind on Hawthorne, an undesirable boxed-in situation.
- Although the OOECA would prefer that the properties on Main between Graham and the Immaculata High School property, would be six storeys, rather than the proposed nine, the nine storeys here would not impact adjacent existing (western) properties, simply because there is no existing residential here.

6. Main Street, West Side – Immaculata High School Frontage

- Proposed: These lands be removed from the OOESP. The idea (Schedule E to Amendment No. 46) is that this property should be excluded from the OOESP and made part of the Rideau Canal Special District through the application of the rule that the Canal Special District extends one property from the Canal
- OOECA: The rule for the Canal Special District makes very little sense for this very large lot, especially the 40 metres of depth on Main Street. The Main frontage should be included in the OOESP and we are of the view that it should be six storeys like the properties on the west side of Main to the south.

**Miscellaneous Corrections, Comments, and Questions Re: Proposed
OOESP “Schedule B – Maximum Building Heights”**

- a. Change Children’s Garden property at 321 Main from blue colour to white.
- b. Change the Forecourt Towns properties at 295 & 355 Deschatelets from blue to yellow – reflects the approved ZBLA.
- c. Change the 530 de Mazenod property from white to pink.
- d. Change the front portion of the 175 Main property from pink to gold and the rear portion to teal to reflect the as-built permissions.
- e. Change the front portion of 155 Main (Saint Paul University) from pink to gold and rear portion to teal, so as to balance the designations along the Grande Allee and reflect the maximum building heights of the current OOESP Schedule B.
- f. Consider the expressed intent of the OOESP Policy 23 by reducing the yellow-coloured area south of Clegg so as to reflect the current Draft 2 New Zoning By-law’s 8.5 m height limit – i.e. Change the yellow colour south of Clegg to another colour having a 2 ½ storey maximum height limit. As OP and ZBL Staff are aware, a 2 ½ storey building can be built under an 8.5 m height limit and can easily accommodate four units “as of right:” basement; 1st floor; 2nd floor; and 3rd floor. On the typical OOE small lots, that results in a density of 132 units per hectare, without major disruption to the character of these neighbourhoods. There are currently only two three- storey buildings within the interior neighbourhood area south of Clegg and west of Main Street. The remainder of the 201 buildings are 2 ½ storey or less.
- g. When will the proposed OOESP wording changes, which will correlate with the proposed and revised OOESP “Schedule B – Maximum Building Heights, be provided to the OOECA for review? At this point in time, the OOECA objects to any and all verbiage changes except to perhaps change the terminology of “Traditional Mainstreet” to read “Mainstreet”, but that is unnecessary. The OOESP was approved by MMAH in November 2022. The PPS does not mandate any changes to the OOESP.