

# DALHOUSIE COMMUNITY ASSOCIATION

755 Somerset Street West, Ottawa, Ontario, K1R 6R1

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Carol Ruddy,  
Acting Program Manager, Zoning Unit  
Planning, Development, and Building Services Department  
City of Ottawa  
110 Laurier Avenue West, 4th Floor  
Ottawa, ON K1P 1J1

By email: Carol.Ruddy@ottawa.ca

Dear Carol Ruddy:

## **Re.: New Zoning By-Law – Draft 2**

The Dalhousie Community Association advocates for the interests of residents in the area of the city that lies between Centretown to the east and Hintonburg to the west, and between the Ottawa River and Carling Avenue, which define our northern and southern boundaries, respectively.

In the past year, and since the release of the second draft in March, we have studied the New Zoning By-law in detail and assessed its potential impact on the development of Chinatown, Little Italy, and LeBreton Flats, the principal communities in our area.

The DCA has a vision for our part of the city, and we look to the NZB to help us achieve it. We support the densification of our small part of the city, and recognize that perhaps more than any other area, we are impacted by major drivers of that densification, with four light rail stations, seven “corridors,” and several community hubs within our boundaries.

We work to ensure that this densification supports the development of inclusive and diversified neighbourhoods, where families can still thrive as they have for generations, and where the urban environment includes a multitude of parks and green spaces and trees.

We want to bring to your attention several issues where the NZB needs to be changed to support this vision, and suggest a number of amendments to Draft 2 that will make the NBZ more effective in Dalhousie.

These issues are:

- 1. The conversion of the R4 (2020) Zone to the N4 Zone**
- 2. The conversion of some R4 Zones to N5 Zones**
- 3. The conversion of R4 zoning to N5 and and CM and MSI Zones along minor corridors and local streets.**
- 4. Hub Zones and the “One Lot for Zoning Purposes” policy in the NZB (Section 144)**
- 5. Greenspace Zones, Recreation Zones, and Trees**

## 6. Parking

## 7. The “West Downtown Core Secondary Plan”

### 1. The Conversion of the R4 Zone to the N4 Zone

Established residential areas within the urban core were included in the R4 zoning review conducted by the city in 2020. These areas currently are primarily R4UB and R4UD zones with a maximum building height of 11 metres, or 3½ storeys.

Draft 2 of the NZB proposes to convert the existing R4 zones in Dalhousie to N4 zones, primarily to N4A and N4B. All N4 zones permit a maximum building height of 14.5 metres, or 4½ storeys.

**Recommendation: In the conversion from R4 to N4 zoning, maintain maximum building heights of 11 metres in Dalhousie’s established residential neighbourhoods.**

These neighbourhoods are identifiable on the location maps from the 2020 rezoning (maps 15-19):

#### Map 15:

Area A, R4UB and Areas B&C R4UD: These established residential areas lie between Somerset Steet West, Balsam Street, Booth Street and Preston Street.

#### Map 16:

Area A, R4UD, and Area B, R4UB: These established residential areas lie between Albert Street and Somerset Steet West, Lorne Avenue/Upper Lorne Place and City Centre Avenue and include Walnut Court and the Lorne Avenue Heritage Conservation District.

#### Map 17:

Area F, R4UB and parts of Areas A, B&C R4UD: These areas lie between Slater Street, Somerset Street West, Bronson Avenue and Empress Avenue.

#### Map 18:

Area B, R4UB: This area lies between Somerset Steet West, Gladstone Avenue, Bronson Avenue and Booth Street.

#### Map 19:

Area D, R4UD: This area lies between Gladstone Avenue, Highway 417, Bronson Avenue and Booth Street. Balsam Street, Bronson Avenue and Booth Street.

#### Discussion:

It is recognized that these neighbourhoods are within the “Downtown Core” Transect policy area and the “Evolving Neighbourhood Overlay.” Moreover, these neighbourhoods are impacted by their proximity to the light rail stations, Hub zones, and corridors. The result is that the established residential neighbourhoods are fragmented, small in area, each comprising only a few city blocks.

Densification in Dalhousie should not emerge from these established residential neighbourhoods, but from the residential developments already occurring in the Hub zones, where more than 15,000-new units are under construction or planned.

In addition, the established residential neighbourhoods, because they are located within a few small city blocks, will be significantly impacted by the increases in density proposed in the NZB, such as at street corners and along corridors (which we generally support).

## **2. The Conversion of Some R4 Zones to the N5 Zone**

Draft 2 of the New Zoning By-law proposes to convert several existing R4 Zones to N5 Zones. This proposal has the potential to place great redevelopment pressure on many established residential neighbourhoods, and in a form that undermines the character of these areas.

As noted in item 7, below, many of these areas are subject to the requirements detailed in the *West Downtown Core Secondary Plan*. The proposed change to N5 zoning is in many cases, in conflict with these requirements.

**Recommendation: The proposal to apply N5 zoning to some existing R4 zones be reversed, and the maximum building heights of 11 metres be maintained in these neighbourhoods.**

Like the N4 zones, these proposed N5 zones can be identified on the R4 location maps from 2020 (maps 14-16):

### Map 14:

Areas C & I, R4UD: These established residential areas lie in two main areas: The first is west of Preston Street, both north and south of Highway 417, and includes Louisa, Young, George, Aberdeen, Beech, Norman, Pamilla, and Adeline Streets. The second is east of Preston, and includes Beech, Norman, Pamilla and Adeline Streets.

### Map 15:

Area A, R4UB, the portion west of Preston Street: This established residential area includes Oak, Laurel, Larch and Balsam Streets.

### Map 16:

Area A, R4UD. The portion of this area proposed for N5 zoning is Walnut Court.

### Discussion:

Like the proposed N4 zones, the established residential neighbourhoods proposed for N5 zoning are fragmented and small in area, each comprising only a few small city blocks.

N5 zones are permitted to have a maximum building height of 30 metres, or nine storeys. The NZB has the potential to incentivize the replacement of low-rise, comparably affordable, ground-oriented residences, with mid-rise, multi-unit residential buildings, in which the units are expensive (for example, at 93 Norman Street).

Draft 2 of the NZB proposes that five per cent of the dwelling units in a mid-rise or high-rise building must have at least three bedrooms. The requirement for large dwelling units in low-rise residential buildings has been reduced, to 15 per cent. The minimum gross floor area requirement for a three-bedroom is 80 square metres.

We need larger, affordable units in Dalhousie; the proposals for large dwelling units in Draft 2 of the NBZ, on the other hand, limit the requirements for these units.

**Recommendation: The requirements for large dwellings outlined in section 708 of Draft 2 of the NZB be maintained as in the current Zoning By-Law 2008-250, and that the minimum gross floor area requirement be increased to 100 square metres.**

Discussion:

Many of the proposed N5 zones abut Hub zones(H2). When adjacent N4 zones, the Zone Provision (10) applies in the H2 zone, which among other matters, establishes maximum building heights according to the building's distance from the lot line.

This provision provides some limited relief for established residential neighbourhoods adjacent a Hub Zone. The rear-yard setback for a tall building in a MS1 zone is reduced, however, when the abutting zone is N5, rather than N4. If the established residential neighbourhoods we have identified are changed from a R4 to a N5 Zone as proposed, this relief may be severely compromised, and the intent of the Building Height Transition Framework, which is to scale building height gradually, negated.

### **3. The Conversion of R4 zoning to N5 and CM and MS1 Zones along minor corridors and local streets.**

Some of the specific changes in zoning proposed in Draft 2 of the NZB stand out as anomalous.

In some cases, the proposed changes could permit mid-to high-rise buildings on local streets. Two instances need to be highlighted:

31 Cambridge Street North/196 Bronson Avenue: This section of a local street is within a proposed N4B zone. Draft 2 of the NZB proposes to allow the zoning from 196 Bronson Avenue to the east to continue to apply on Cambridge Street North.

118, 116 and 114 Primrose Avenue, and 66-136 Upper Lorne Place: The NZB proposes to change the zoning for these local residential streets from R4UB to CM1(2825).

**Recommendation: MS1 and CM zoning not be permitted on local streets, except as required under the city's "Neighbourhood Uplift Zoning Strategy," which allows some limited increased density at street corners.**

A number of proposed MS1 and CM zones have been permitted to bleed out from a main street to encompass areas of existing low-rise housing.

10 Preston and 21 Preston/746 Albert: The NZB proposes to change the zoning for the low-rise residences in these areas, which have a dense, compact urban form, from the existing R4UD, to MC1. It is not likely that the redevelopment of these areas will be required before 2046 to achieve the city's densification target. And has been noted in the case of some of the proposed N5 zoning, these proposed changes could result in the loss of affordable housing in the Dalhousie area.

#### Discussion:

Corridors: We recognize that the provincial government has mandated a building height increase along corridors. Dalhousie has seven streets for which corridor zoning is proposed: Albert, Beech, Booth, Bronson, Gladstone, Preston and Somerset West. The interiors of these streets, in most cases, are made up of established low-rise residences, now proposed for N4 zoning.

Most problematic is the new zoning proposed for Booth, a minor corridor. Booth cuts through an established residential area on its east and west sides, from Albert Street to Highway 417. (The exception is the property at 818 Gladstone Street, which is under redevelopment within a R5BB [2689] S432 zone, and which will become N6B [2689] S432 under Draft 2 of the NZB.)

The significant changes proposed for Booth are immediately evident on the city's interactive zoning map: Booth is transformed from orange (low-rise mixed use and residential zones) to purple (Minor Corridor Subzone 1) in the proposed change from the existing zoning by-law to the NZB.

Do we need a corridor here, where there is a major corridor two blocks to the west (Preston) and five blocks to the east (Bronson)? Or is it, as has been described elsewhere, "an excessive dissection of the residential community?" And do we need more at-grade commercial uses on Booth, particularly between Albert and Somerset West? *We are* a fifteen-minute community.

**Recommendation: Booth Street between Albert Street and the Queensway be zoned CM1, with the suffix H (13.5), and with an exception restricting at-grade commercial development on Booth between Albert and Somerset West, and Gladstone and the Queensway.**

It is important that CM 1 Zone Provision (10) "**Transition**" is maintained.

#### **4. Hub Zones and the "One Lot for Zoning Purposes" policy in the NZB**

The Dalhousie area has an abundance of Hub (H2) Zones, stretching from Carling Avenue to Albert Street (and including the Canada Lands property at 555 Booth Street) and three distinct H1 Hub Zones, in LeBreton Flats.

Under Section 144 of Draft 2 of the NZB these Hub Zones, while they may include specific areas included in the *West Downtown Core Secondary Plan*, and permit a broad range of uses and building forms, they are treated as one lot for zoning purposes until they are developed by their owners (which, in the case of 1010 Somerset, is the city).

Two principal risks arise from this approach. First, the requirements of the *West*

*Downtown Core Secondary Plan* are compromised or ignored; and, secondly, the Hub Zones are extended in the NZB so that the existing zoning is effectively erased.

1010/930 Somerset Street West: The DCA and other local organizations have for some time struggled to have the requirements of the *West Downtown Core Secondary Plan* incorporated within the site plan for this area, with little success. It seems reasonable to be concerned that future developers of areas within Hub zones will follow the city's example, and may view the Hub Zone as a 'blank slate' for development purposes.

(An example where a valued zoning designation within a Hub zone *has* been isolated and retained in the NZB is at 552 Booth, where a specific Greenspace has been identified for the future Norman Rochester Park.)

Rochester, Between Beech and Adeline: Several properties in this area currently zoned R4 have been absorbed in an expanded Hub zone, permitting in the place of existing low residences, high rise residential buildings. Notably, the north side of Adeline west of Rochester, a residential zone that is proposed become a part of the Hub zone, has been provided a H (13.5) suffix. Why, then, extend the Hub?

The green transportation/utility corridor between Carling and Albert: Hub Zones are proposed that will envelop the current Transportation Zones for line 2 of the LRT, which include this corridor.

At 1030 Somerset Street West, where the Trillium Pathway within the Transportation Zone joins Somerset West, the corridor should be assigned distinct zoning to recognize and preserve its role within the green transportation/utility corridor, apart from the Hub Zone. Draft 2 of the NZB indicates that high-rise residential development may take place at this location. Pathway access to Somerset West through this corridor, of course, is a requirement of the secondary plan.

**Recommendation: That where Hub zones are proposed in the NZB, the current zoning in these areas be retained, as at 552 Booth.**

The Canada Lands Property at 552 Booth (between Rochester and Booth, Norman and Orangeville), known as the Booth Street Complex has been subject to broad public engagement, including the publication of a detailed public realm plan in the *West Downtown Core Secondary Plan* (Schedule H). The proposed development includes specific building heights, five designated heritage buildings, and affordable housing.

**Recommendation: That Draft 2 of the NZB provide zoning for the Booth Street Complex that is transparent, so that the distinct elements that are to be retained in future development are clearly identified**

## **5. Greenspace Zones, Recreation Zones, and Trees**

Dalhousie has a greenspace deficit: Greenspace here is about 25 per cent of the city's average, measured as the number of hectares per 1,000 population. As densification increases, so does the greenspace deficit, and with it, the "heat island effect."

Tree canopy in our neighbourhoods is 13 per cent; city-wide the tree canopy averages 34 per cent. The Official Plan target is much higher. Most householders rent their dwellings, many of them in mid and high-rise buildings, with little to no access to personal greenspace.

The DCA is an active member of the Community Associations for Environmental Sustainability. We support the regulation of space for trees to foster their growth, protection and survival. **The DCA stands with CAFES and the recommendations detailed in *Zoning By-law Position Paper: How Zoning Can Regulate Trees*, submitted to the city, October 31, 2024.**

Despite the critical need for more greenspace, Draft 2 of the NZB adds none. Nevertheless, the potential for the development of more greenspace lies within the broad swathes of Hub Zones and Open Space Facility Zones. Some of these greenspaces have been identified previously in city planning documents, including the Official Plan, but not in Draft 2 of the NZB.

Greenspace identified in the *West Downtown Core Secondary Plan*: We have identified above, areas where the general use of the Hub Zone designation puts greenspace at risk: at 1010/930 Somerset Street West, and the green transportation/utility corridor at 1030 Somerset Street West.

A future park site at 250 City Centre Avenue, identified as distinct from the Hub in the secondary plan, remains concealed in Draft 2 of the NZB.

**Recommendation: All greenspace, including areas identified as future parks and those within the green transportation/utility corridor, identified in the *West Downtown Core Secondary Plan*, be assigned the appropriate zoning in Draft 2 of the NZB.**

520 and 550 Albert in the Albert Corridor: The city has recently completed significant improvements in this area, including linking these properties to create a new greenspace across from the main entrance to Ādisōke.

**Recommendation: That the new greenspace south of 555 Albert be identified as Greenspace (GRN) in Draft 2 of the NZB.**

The Escarpment Area District: the city's *Escarpment Area District Plan* was published in November of 2008, but its vision remains current, and, of course, the physical reality of the Escarpment itself endures.

The greenspace the city has recently added to the Albert Corridor reflects this vision, as do the proposed Recreation Zones at 506 Commissioner Street and 19 Empress Street North. The Escarpment links these two zones, and makes the connection to the greenspace within the Institutional Zone at 90 Primrose Avenue East.

The Escarpment is a unique physical feature within the urban core, and should be identified as such within the NZB.

**Recommendation: The Escarpment, in the Albert Corridor, and wherever possible, should be designated as Greenspace (GRN) in Draft 2 of the NZB.**

## 6. Parking

With respect to the proposals for communal parking areas in planned unit developments, the DCA has two concerns.

The first is that the requirement that such areas take up no more than 30 per cent of the area of the lot not be weakened in any way.

The second is that new surface parking lots should not be permitted in the Downtown Core and Inner Urban Transects.

## 7. West Downtown Core Secondary Plan

The *West Downtown Core Secondary Plan* is a component of the Official Plan, which is acknowledged, of course, in Draft 2 of the NZB. Yet there are several instances, some already highlighted above, where the proposed zoning obscures the requirements of the secondary plan.

We have already noted the problematic proposal to apply the N5 Zone to many areas of our communities. Among them are the “Preston Side Streets,” to which specific policies in the secondary plan apply. (See pages 56-57, and Schedules M and O.)

Draft 2 of the NZB recognizes, in general, that there are maximum height limits in the secondary plan in areas of low and mid-rise residences. Yet these limits are not always reflected in the proposed new zoning.

**Recommendation: That regardless of the zoning proposed in Draft 2 of the NZB, that the height suffix appropriate for the requirements provided in Schedule M of the *West Downtown Core Secondary Plan* be added to the zone code.**

**Discussion:** For example, 11 Larch is a property for which it is proposed that the zoning change from the current Residential Zone R4UB to a Neighbourhood Zone N5A. The N5 zones permit heights of 30 metres (9 storeys). Schedule M requires that the building height at this property location be limited to 6 storeys (20metres) or fewer. This type of inconsistency should be resolved in Draft 2 of the NZB in favour of the secondary plan.

We are told that many of the requirements of the secondary can be incorporated in specific site plans in the future, such as in the Hub Zones. Yet as we have seen in the development proposed for 1010/930 Somerset, where the city itself is the proponent, the site plan has ignored and, in some cases, contradicted the secondary plan. Changes have been proposed that are not consistent with the *West Downtown Core Secondary Plan*. These proposals have been made without prior consultation with the community partners who participated in the preparation of the plan.

In addition to building heights, a principal element of the secondary plan that must be reflected in Draft 2 of the NZB is the public realm, as illustrated in Schedules F, H, I and N, in particular. Some of these elements of the public realm that are not reflected in the proposed new zoning are highlighted in the discussion of Greenspace Zones, Recreation Zones and Trees, above.

**Recommendation: That Draft 2 of the NZB be made to conform with the policies of the Official Plan, as expressed in the *West Downtown Core Secondary Plan*, and, in particular, the policies impacting building heights and the public realm.**

We appreciate the work of city staff in the preparation of Draft 2 of the NZB, and the enormity of the task of re-zoning on a property-by-property basis.

Nevertheless, we ask that you consider our specific recommendations for changes, so that densification in Dalhousie will help our communities achieve their vision for diverse, inclusive, and greener neighbourhoods.

Sincerely,

(signed)

Ed McKenna  
VP DCA  
Chair, NZB Working Group

cc.: Councillor Ariel Troster, Somerset Ward