

Zoning By-law Amendment  
3750 North Bowesville Road

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## **Tudor Hall: Key Issues**

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August 11, 2023

Hunt Club Community Association (HCCA)  
Ottawa, Ontario

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## Executive Summary

### Introduction

- The purpose of this discussion paper is to support the Hunt Club Community Association's review of the re-zoning application for 3750 North Bowesville Road ("Tudor Hall").
- This application raises important questions about the trade-offs required to manage growth and support intensification – particularly the role of increased density and reduced parking standards in an area designated as a low-rise "Neighbourhood" by the new Official Plan.
- At the same time, low vacancy rates in Ottawa – and across the country – have increased the pressure for affordable housing. In 2022, for example, the vacancy rate for rental units in Ottawa was only 2.1%, while average rents increased by 4.8%. In response, the City has set an ambitious target of 151,00 new housing units by 2031.

### Considerations

- In this context, the "Tudor Hall" proposal to build two 14-storey apartment towers offers a number of benefits and challenges.
- **Benefits.** This project supports the City's plans to increase housing supply within the Greenbelt. The proposed development:
  - *will potentially provide 392 new residential units;*
  - *is within 100 metres of a bus stop on Uplands Drive;*
  - *is located next to existing high rise office buildings (6 and 10 storeys);*
  - *will replace an under-utilized commercial property;*
  - *appears to comply with the City's design guidelines;*
  - *has re-oriented one of the towers to provide a more gradual transition to the surrounding neighbourhood.*
- **Concerns.** This project conflicts with the City's efforts to direct the most intense development towards "Hubs" and "Mainstreet Corridors". The proposed development:
  - *is located within a "Neighbourhood" designation in the Official Plan;*
  - *is more than 4 kilometres away from the nearest rapid transit station;*
  - *seeks a higher density than comparable high-rise projects in River Ward;*
  - *provides some 40% fewer parking spaces than required by the zoning by-law;*

- may increase traffic congestion and spillover parking on nearby streets;
- does not include “affordable” low-income units;
- does not provide commercial services on the ground floor of the towers.

## River Ward: Key Comparisons

- In comparison with other high-rise developments in River Ward, the Tudor Hall proposal is an outlier in several respects. It is one of the furthest away from a rapid transitway, and yet it seeks approval for comparatively high density and low parking availability (*see Annex D for details*).
- **Distance from Rapid Transit.** The Tudor Hall and St. Mary’s projects are by far the furthest away from the nearest rapid transit station - **4.2** and **4.5** kilometres respectively. Two “Neighbourhood” developments on Ridgewood and Brookfield are within 1.0 kilometre of rapid transit stations. Four “Mainstreet” developments are located within 500 metres of an LRT station or on future rapid transitways along Baseline Road and Carling Avenue.
- **Floor Space Index.** Of these proposals, the Tudor Hall application seeks the second highest density in River Ward, and its Floor Space Index (FSI) of **4.89** is comparable only to the four “Mainstreet” developments. By contrast, the nearby “Neighbourhood” developments on Ridgewood and Brookfield provide much lower density (FSI 2.89 and 1.73) <sup>1</sup>.
- **Parking.** The Tudor Hall proposal seeks a reduction in the minimum parking standard from 1.2 per residential unit to **0.7** spaces - much closer to the 0.5 standard which is applied to “Mainstreet” projects. By comparison, the proposal at 729 Ridgewood seeks a relatively minor reduction in the minimum parking standard (from 1.2 to 1.0).

### Summary: Key Comparisons

Address	Floor Space Index (FSI)	Parking / Res. Unit	Distance (LRT/BRT)	Designation (Official Plan)
1420 Richmond <sup>2</sup>	6.40	1.0	0.5 km	Mainstreet
1640-60 Carling	5.96	0.5	0 km	Mainstreet
<b>3750 N. Bowesville</b>	<b>4.89</b>	<b>0.7</b>	<b>4.2 km</b>	<b>Neighbourhood</b>
780 Baseline <sup>3</sup>	4.48	0.5	0 km	Mainstreet
1345 Baseline	4.47	0.5	0 km	Mainstreet
3930-60 Riverside	3.75	n/a	4.5 km	Minor Corridor
<b>729 Ridgewood</b>	<b>2.89</b>	<b>1.0</b>	<b>1.0 km</b>	<b>Neighbourhood</b>
<b>770 Brookfield</b>	<b>1.73</b>	<b>0.5</b>	<b>0.5 km</b>	<b>Neighbourhood</b>

<sup>1</sup> The Floor Space Index (FSI) is a measure of density that divides the gross floor area by the total site area.

<sup>2</sup> Approved by Planning and Housing Committee on April 23, 2023. This project is located in Bay Ward, but provides a close comparison to the Tudor Hall project: it proposes two 12-storey towers with 391 units.

<sup>3</sup> Located in Knoxdale-Merivale Ward, adjacent to a residential community in River Ward.

## Alternative Scenarios

- In light of the current pressures to provide more housing, some version of the Tudor Hall proposal is likely to be approved by City Council. The existing zoning permits a height of 44 metres above ground (up to 14 storeys) and any reduction in this limit would run the risk of a successful appeal to the Ontario Land Tribunal.
- The Applicant, however, seeks amendments to the Floor Space Index and minimum parking standard which are comparable to high-rise developments in “Mainstreet” designations. It is appropriate for the City to consider alternative scenarios which would bring this proposal into line with other high-rise developments in River Ward.
- The City, for example, could approve an increase in the Floor Space Index to a level comparable to 770 Ridgewood Avenue (2.89) or to the apartment portion of 3930-3960 Riverside Drive (3.75). Alternatively, it could reduce the residential parking standard for this site from 1.2 to 1.0 (comparable to 770 Ridgewood). The effect of changes to these variables would be to encourage a less intensive development.
- In addition, the HCCA and the City should explore a number of ways to mitigate the impact of this proposal while still providing much-needed housing. These measures might include:
  - *Commitments by the Applicant to add affordable units to the proposed development, or to make a substantial contribution to the City’s affordable housing fund (beyond the required Community Benefit Charge);*
  - *Shared parking in IBM’s three-storey parking garage, which is now virtually empty;*
  - *Concrete commitments by the City to improve transit service and active transportation networks near the proposed development (e.g. through the Transportation Management Plan).*

## Next Steps

- The HCCA is prepared to meet with the Applicant to discuss the above issues. It will consult with Councillor Brockington and submit a position paper to City staff when the application is re-submitted.
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# Tudor Hall: Key Issues

## 1. Introduction

- The purpose of this discussion paper is to support the Hunt Club Community Association's review of the re-zoning application for 3750 North Bowesville Road ("Tudor Hall").
- This re-zoning application will be considered by City Council in the context of Ottawa's current housing crisis, a new Official Plan, an updated Transportation Master Plan, and a Zoning By-law Review. It is only one of many new high-rise projects across the city.
- In light of this site's "Neighbourhood" designation in the Official Plan, key issues include: the lack of a commitment to affordable housing in the Tudor Hall development; the relatively high density of the project; its impact on local traffic flows; and the unusually low number of parking spaces provided for residents and visitors.

## 2. Ottawa's Housing Crisis

- All levels of government have emphasized the need to address the current housing crisis, with particular reference to "affordable" or "below-market-rate" rental housing. In 2022, for example, the vacancy rate for rental units in Ottawa was only 2.1% - while average rents increased by 4.8%<sup>4</sup>. This national housing crisis poses complex economic and policy challenges for federal, provincial, and municipal governments.
- At the *federal* level, the National Housing Strategy lays out an investment of \$82 billion over 10 years and has set a goal of 160,000 new housing units between 2018-2028<sup>5</sup>. As part of this strategy, the Canada Mortgage and Housing Commission (CMHC) offers lower rates to developers for loans and mortgage insurance in exchange for specified levels of energy efficiency and affordability<sup>6</sup>.
- Although these programs have been welcomed by developers, they have also been criticized for a lack of transparency and clear evidence of their effectiveness. Moreover, in the face of economic factors which make affordable low-income housing unprofitable, some policy analysts have suggested that the federal government could make a greater

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<sup>4</sup> Canada Mortgage and Housing Corporation, *Rental Market Report, 2022*, pp.114-117.

<https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/market-reports/rental-market-reports-major-centres>

<sup>5</sup> <https://www.placetocalhome.ca>

<sup>6</sup> <https://www.cmhc-schl.gc.ca/about-us/cmhcs-story>

impact on the housing crisis by removing its sales tax on the construction of new rental units<sup>7</sup>.

- At the *provincial* level, the government of Ontario has set a goal of 1.5 million new homes over 10 years and has imposed specific housing targets for the province's largest municipalities<sup>8</sup>. At the same time, some home builders have suggested that delays in planning approvals are to blame for the shortfall in new housing starts, and the Province of Ontario has passed legislation mandating streamlined and expedited approval processes<sup>9</sup>.
- In response, municipalities have pointed out that thousands of planning applications have been approved by cities across Ontario, but developers have not broken ground on these projects owing to other factors - such as high interest rates, labour shortages, and supply chain issues<sup>10</sup>.
- At the *municipal* level, as noted above, the City of Ottawa has been obliged by the province to set an ambitious target of 151,000 new homes by 2031<sup>11</sup>. To this end, the City has applied for a grant of some \$150 million from CMHC's Housing Accelerator Fund and has identified seven strategic initiatives designed to address the housing crisis<sup>12</sup>.
- At the same time, a number of major new developments have been proposed for apartment towers reaching as high as 40 or more storeys. It remains to be seen whether economic conditions will enable the completion of these projects and, in particular, what proportion of these new units will be "affordable" rental units<sup>13</sup>.
- In this context, the Tudor Hall development proposal - if it proceeds to construction - will provide some 392 "market rate" units of various sizes, including studios, one-bedroom, and two-bedroom apartments. There is no indication, however, that the Applicant intends to devote a portion of the units in this development to "below market rate" housing. Such a contribution would be consistent with the goals for affordable housing set by the Province and the City.
  - *The City should make every effort to encourage the Applicant to provide "below market rate" units or to make a suitable contribution to the Ward's affordable housing fund.*

<sup>7</sup> <https://www.theglobeandmail.com/business/commentary/article-housing-crisis-rentals-waive-sales-tax/#:~:text=Benjamin%20Tal%20is%20the%20deputy,incur%20for%20purpose%2Dbuilt%20rentals>

<sup>8</sup> <https://www.ontario.ca/page/more-homes-built-faster>

<sup>9</sup> [https://engage.ottawa.ca/provincial-legislation-planning/news\\_feed/bill-23-2](https://engage.ottawa.ca/provincial-legislation-planning/news_feed/bill-23-2)

<sup>10</sup> <https://www.cbc.ca/news/canada/toronto/ontario-housing-construction-cities-report-card-1.6916180>

<sup>11</sup> <https://ottawacitizen.com/news/local-news/while-achievability-is-a-question-mark-ottawas-planning-committee-takes-housing-pledge-to-support-ontario-goal-of-1-5m-new-homes>

<sup>12</sup> <https://www.cbc.ca/news/canada/ottawa/ottawa-housing-plan-1.6897894>;  
<https://pub-ottawa.escibemeetings.com/filestream.ashx?DocumentId=134794>

<sup>13</sup> <https://www.cbc.ca/news/canada/ottawa/15-highrise-megaprojects-that-could-reshape-ottawa-s-skyline-1.6907968>

### 3. Planning Context

#### Current Application

- The current development application seeks a Zoning By-Law Amendment in support of a residential complex consisting of two 14-storey towers. The Applicant seeks approval to reduce the number of required parking spaces and to increase the floor space index for the two towers<sup>14</sup>.
- The complex would be built on the site of the Tudor Hall banquet facility. This site is surrounded by the IBM buildings to the west and a large parking garage to the north. The new towers would overlook the low-rise residential area to the east and the grounds of the Ottawa Hunt and Golf Club (*see Annex A*).
- The owner of the property is the Jennings Real Estate Corporation, which holds a portfolio of commercial properties across Ottawa, including an office building at the corner of Hunt Club Road and the Paul Benoit Driveway<sup>15</sup>. The application has been prepared by a well-established architectural firm and planning consultancy.
- The status of the development application is effectively “on hold”. An application was first filed in early 2022 and a public meeting was held in May. Most of the comments from the public focussed on the negative traffic impacts, the reduction in parking spaces, and the abrupt transition from the high-rise towers to the low-rise residential area.
- In November 2022, the Applicant filed a revised application which proposed a substantial increase in the number of units (from 365 to 392) and a reduction in the number of parking spaces (from 343 to 327)<sup>16</sup>. In addition, at the suggestion of a participant in the public meeting, the placement of the north tower was adjusted so that the stepped façade for both towers would face toward the residential area on the east (*see Annex B*).
- The Applicant has now indicated that the current application will be re-submitted at some future date with unspecified changes.

**Commented [PM1]:** We now know the height is unlikely to increase.

<sup>14</sup> <https://devapps.ottawa.ca/en/applications/D02-02-22-0032/details>.

<sup>15</sup> <https://www.jenningsdevelopments.com>

<sup>16</sup> See Applicant’s *Site Plan* (2023-02-21, posted 2023-05-08).



## Official Plan and Zoning By-law

- The City’s new Official Plan is focussed on managing growth and supporting urban intensification between 2021 and 2046. In response to the current housing crisis and climate change, the plan promotes the ideal of high-density, highly walkable “15-minute neighbourhoods” which will make efficient use of land and minimize the use of vehicles.
- To this end, the new Official Plan divides the city into “transect” policy areas with varying levels of intensification: Downtown Core, Inner Urban, Outer Urban, Greenbelt, Suburban, and Rural. The proposed development site on North Bowesville Road is located within the “Outer Urban” transect (*see Annex C*).
- In addition, the Official Plan has provided a hierarchy of development areas<sup>17</sup>. These designated areas include:
  - **Hubs**, which are mostly located near rapid transit stations;
  - **Mainstreet Corridors** along rapid transitways (existing or planned);
  - **Minor Corridors** which are located on other arterial roads; and
  - **Neighbourhoods** which are generally low-rise residential areas, with exceptions for high-rise development where permitted by existing zoning.

According to the Applicant’s planning rationale, the Tudor Hall site is located within a “Neighbourhood” designation. It is not subject to an “Evolving Overlay”, which would encourage more intense development. It is, however, in close proximity to a “Minor Corridor” designation running along Riverside Drive. The Official Plan encourages low-rise or “missing middle” development in Neighbourhood designations, except when site-specific height limits permit high-rise buildings (10 storeys or more).<sup>18</sup>

- The Applicant argues that the current General Mixed Use (GM) zoning permits both commercial and residential units, that the 14-storey towers comply with the existing height limit for this site, and that the proposed development would replace an under-utilized commercial space with a more intensive use<sup>19</sup>.

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<sup>17</sup> City of Ottawa, *Official Plan (2022)*, Sections 5-6.

<sup>18</sup> See “*Neighbourhood Characteristics*” discussion paper, Zoning By-Law Review, “Engage Ottawa” website.

<sup>19</sup> *Planning Rationale and Design Brief* (April 2022), pp. 23, 27-29. The Applicant notes that, in the new Official Plan, “the Outer Urban Transect is generally characterized by low- to mid-density development, with new development being predominantly low-rise within Neighbourhoods”, and that new housing types in these areas will “focus on lower density missing-middle housing”. It adds, however, that “apartment forms” will be allowed in “areas closer to, but not limited to, rapid-transit stations, Corridors, and neighbourhood amenities”.

- If the project proceeds, the two high-rise towers will potentially provide 392 new residential units. The Applicant argues that these towers comply with the City’s design guidelines and notes that they are situated next to existing office buildings (10 and 6 storeys respectively). Moreover, the re-zoning application notes that the Tudor Hall site is within walking distance of an OC Transpo bus stop, a number of commercial and retail services, and active transportation networks.
- Nevertheless, the proposed development raises a number of concerns. Although this site is not located close to either a Light Rail Transit (LRT) station or a Bus Rapid Transitway (BRT), the Applicant seeks an exemption from the City’s minimum parking standards for this area. It also seeks to substantially increase the permitted density of development on this site, with few open spaces or soft landscaping accessible to the public.
- The Applicant’s transportation impact study describes the resulting traffic volumes as “negligible” and does not suggest any mitigation measures<sup>20</sup>. The current proposal also does not address the need for “affordable” low-income units and does not provide commercial or retail space on the ground floor of the towers.
  - *When considering this application, the City should take into account the intent of the Official Plan’s “Neighbourhood” designation for this site and seek ways to mitigate the impacts of this proposed development on the surrounding community.*

**Key Comparisons: Other High-Rise Developments**

- In comparison with other high-rise developments in River Ward, the Tudor Hall proposal is an outlier in several respects. It is one of the furthest away from a rapid transitway, and yet it seeks approval for comparatively high density and low parking availability (*see Annex D for details*).
- **Distance from Rapid Transit.** The Tudor Hall and St. Mary’s projects are by far the furthest away from the nearest rapid transit station - **4.2** and **4.5** kilometres respectively. Two “Neighbourhood” developments on Ridgewood and Brookfield are within 1.0 kilometre of rapid transit stations. Four “Mainstreet” developments are located within 500 metres of an LRT station or on future rapid transitways along Baseline Road and Carling Avenue.
- **Floor Space Index.** Of these proposals, the Tudor Hall application seeks the second highest density in River Ward, and its Floor Space Index (FSI) of **4.89** is comparable only to the four “Mainstreet” developments. By contrast, the nearby “Neighbourhood” developments on Ridgewood and Brookfield provide much lower density (FSI 2.89 and 1.73).

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<sup>20</sup> *Transportation Impact Assessment* (October 2022), p.25.

- **Parking.** While the Brigil proposal at 729 Ridgewood seeks a relatively minor reduction in the minimum parking standard for residential spaces (from 1.2 to 1.0), the Tudor Hall proposal seeks a standard of **0.7** spaces - much closer to the 0.5 standard which is applied to the “Mainstreet” projects.

**Table 1**  
**Key Comparisons: Summary**

Address	Floor Space Index (FSI)	Parking / Res. Unit	Distance (LRT/BRT)	Designation (Official Plan)
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780 Baseline <sup>22</sup>	4.48	0.5	0 km	Mainstreet
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<b>770 Brookfield</b>	<b>1.73</b>	<b>0.5</b>	<b>0.5 km</b>	<b>Neighbourhood</b>

- *The Applicant should consider reducing the proposed Floor Space Index for this site to a level comparable with other high-rise developments in “Neighbourhood” designations.*

<sup>21</sup> Approved by Planning and Housing Committee on April 23, 2023. This project is located in Bay Ward, but provides a close comparison to the Tudor Hall project: it proposes two 12-storey towers with 391 units.

<sup>22</sup> Located in Knoxdale-Merivale Ward, adjacent to a residential community in River Ward.

## 4. Transportation Impacts

### Traffic congestion

- Although the Applicant's transportation impact study concludes that the proposed development will have a minimal impact on traffic volumes, this conclusion is not shared by nearby residents who have experienced serious traffic congestion at peak periods<sup>23</sup>.
- While the volume of traffic generated by the Tudor Hall development may be relatively minor, this new traffic will increase the existing congestion on some of the busiest roads in the City. In combination with major new developments in Riverside South and at the St. Mary's site, the Tudor Hall project will produce an increase in traffic volumes on these arterial roads.
- In addition, existing congestion at the intersection of Uplands Drive and Riverside will likely worsen significantly during peak periods. The lengthening of the west-bound queue may pose an increased risk of collisions, particularly due to vehicles turning from Bowesville Road onto Uplands.
  - *The City should consider traffic mitigation measures for Uplands Drive near the proposed development.*

### Transit network

- The Applicant's planning rationale notes that Hunt Club Road and Riverside Drive are designated as "Transit Priority Corridors" in the Official Plan. In fact, only "isolated measures" are envisioned for infrastructure improvements along these corridors, and there is no plan for rapid transit in the vicinity of the site<sup>24</sup>.
- There are existing bus stops for OC Transpo's Route 90 on Uplands Drive, within 100 metres of the site. Bus stops for the east-west routes on Hunt Club Road are over 400 metres away (if reached by walking through the adjacent golf club). The nearest rapid transit station is five kilometres away at South Keys, requiring a bus ride of some 15-20 minutes.
- With the completion of the LRT station at South Keys, there will be an increased incentive for residents to use the more direct bus route on Hunt Club Road to connect with the rapid transit network. In addition, the development of the nearby "St. Mary's" site will likely increase the demand for bus service on Hunt Club Road and Riverside Drive.

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<sup>23</sup> *Transportation Impact Assessment* (Oct. 2022), p.13, projects that "59 AM and 69 PM new peak hour two-way vehicle trips" will be generated by the proposed development.

<sup>24</sup> *Planning Rationale*, p.5.

- Finally, the Applicant’s transportation impact study applies the “mode share” formula recommended by the “TRANS Trip Generation Manual (2020)”, which is derived from the National Capital Region’s most recent Origin Destination Survey<sup>25</sup>. The travel rates for high-rises in the Hunt Club district are shown as follows:

**Table 2**  
**TRANS Recommended Mode Share - Hunt Club (High-Rises)**

<b>Travel Mode</b>	<b>AM</b>	<b>PM</b>
Auto Driver	39%	44%
Auto Passenger	6%	11%
<b>Transit</b>	<b>44%</b>	<b>35%</b>
Cycling	1%	2%
Walking	9%	9%
<b>Total</b>	<b>100%</b>	<b>100%</b>

- This formula, however, may not apply at the Tudor Hall site, since most high-rises in the Hunt Club district are much closer to rapid transit. As a result, this district-wide methodology is likely to over-estimate the mode share of transit users at this site (at least without further investment by the City to improve transit services).
  - *The City and OC Transpo should consider ways to increase the frequency and convenience of bus service in this area.*
  - *The City should consider revising the modal share assumptions in a Transportation Impact Assessment conducted for this site.*

**Active transportation network**

- The Applicant’s planning rationale refers to the City’s active transportation network (p.7), but does not clarify that many of the pathways near the proposed development are “future” amenities and are not likely to be built for some time. These future amenities include multi-use pathways along the Rideau River or through the Southern Corridor which are part of a long-held vision that has never been implemented.
- The proposed towers, along with the St. Mary’s and Brigil developments, will increase the need for active transportation facilities in this area. At the same time, these developments

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<sup>25</sup> For this purpose, the Hunt Club district consists of River Ward south of the rail line (i.e. the boundaries of the HCCA) and much of Gloucester-Southgate south of the rail line. See *Transportation Impact Assessment*, pp. 12-13. The TRANS site does not provide a link to the 2020 trip generation manual, but see the 2011 Origin Destination survey results for Hunt Club: <http://www.ncr-trans-rcn.ca/wp-content/uploads/2013/03/180-HuntClub-2011.pdf>

strengthen the case for a segregated cycle track or multi-use pathway along Riverside Drive from Walkley Road to Rivergate Way<sup>26</sup>.

- The Applicant has not provided an estimate of the applicable “Parkland Dedication” fee and “Community Benefit Charge”. Such contributions could be used to support the construction of a cycle track on Riverside Drive or a multi-use pathway in the nearby Riverwood Park, as part of a cost-sharing agreement with the developer of the St. Mary’s project<sup>27</sup>.
  - *The City should strengthen the active transportation network in the surrounding community by assigning a high priority to including a cycle track or multi-use pathway along Riverside Drive in the Capital Infrastructure Plan.*
  - *The City should provide an estimate of the applicable “Parkland Dedication” fee and the “Community Benefit Charge” which will be paid by the Applicant, and indicate how this revenue will be used to benefit the surrounding communities.*

#### **Ottawa Golf and Hunt Club – public access to pathway**

- The portion of North Bowesville Road which runs from Tudor Hall to Hunt Club Road is privately owned by the Ottawa Hunt and Golf Club. In 1997, the City and the Club reached an “arrangement” which closed this stretch of Bowesville to vehicle traffic, in exchange for public access by pedestrians and cyclists.
- In response to security concerns about the proposed development at Tudor Hall, the Club is now considering whether to discourage pedestrian and cycling access by making this pathway less attractive to the general public<sup>28</sup>. If it does so, it will have a significant impact on active transportation networks in the surrounding community.
- As noted on the HCCA website, Bowesville Road dates back to the mid-19<sup>th</sup> century. The portion which is now private provides the only direct pedestrian and cycling route between Uplands Drive, the services and bus stops on Hunt Club Road, and the Paul Benoit parkway to the airport. The alternative route is a long detour through the intersection of Hunt Club and Riverside Drive.
  - *The City should work with the Ottawa Golf and Hunt Club to maintain public access to the pedestrian and cycling pathway from North Bowesville Road to the Hunt Club Road.*

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<sup>26</sup> This project is a candidate for funding in the Capital Infrastructure Plan which will be prepared in support of the 2024 Transportation Master Plan.

<sup>27</sup> <https://engage.ottawa.ca/cbc-strategy>.

<sup>28</sup> <https://ottawahuntclub.org/rezoning-request-for-the-tudor-hall-property-adjacent-to-the-club/>.

## 5. Parking Standards

### Recent trends in urban planning

- Urban planners are increasingly exploring alternatives to the use of minimum parking standards. These standards are seen as counter-productive, since they may result in an over-supply of parking, increase the cost of development, and discourage efforts to reduce vehicle use.
- Some jurisdictions have selectively reduced or eliminated minimum parking standards in downtown areas and along rapid transit corridors. Others have eliminated minimum parking standards altogether, trusting market forces to strike the right balance between too much and too little on-site parking.
- In Canada, the most dramatic examples of this approach are the cities of Edmonton and Toronto, which eliminated minimum parking standards entirely in 2021 and 2022 respectively (with exceptions for accessible parking spaces and bicycles)<sup>29</sup>.
- As recently as 2016, the City of Ottawa conducted a wide-ranging review of its parking policies and adjusted its zoning by-laws accordingly. There are some indications that the current Zoning By-law Review will result in further reductions in minimum parking standards, but the existing standards are still among the lowest in Ontario.<sup>30</sup>
- As part of the current Zoning By-law Review, the City has published a discussion paper which points out that apartment households have a relatively low level of car ownership compared to other types of dwellings. It notes that 34% of apartment households in the Outer Urban Transect do not own vehicles - compared to 43% in downtown wards and 17% in suburban wards<sup>31</sup>.

**Commented [PM2]:** I don't think this is necessary, and I actually disagree the characterization of Toronto- much of the city proper is still low-rise suburbs.

### Proposed reduction in parking spaces

- With respect to Tudor Hall, the Applicant seeks permission to provide 225 fewer parking spaces than would otherwise be required by the current parking standard, a reduction of 41% in the total number of spaces. This change would substantially reduce the number of parking spaces available to both residents and visitors (*see Table 3*).

<sup>29</sup> <https://www.toronto.ca/city-government/planning-development/planning-studies-initiatives/review-of-parking-requirements-for-new-development/>

<sup>30</sup> <https://ottawa.ca/en/planning-development-and-construction/maps-and-zoning/zoning-completed-projects#section-5c5c9b45-6b12-448d-9209-4d01d9337389>

<sup>31</sup> <https://engage.ottawa.ca/zoning>. *Neighbourhood Character Discussion Paper*, March, 2023. p. 17. The source of this data appears to be the 2022 Origin Destination Survey (results to be published in Fall 2023). There is no breakdown by distance from rapid transit.

**Table 3**  
**Parking Spaces: Required and Proposed**

	<b>Spaces Required</b>	<b>Spaces Proposed</b>	<b>Change</b>	<b>% Change</b>
<b>Resident</b>	473	<b>287</b>	-186	<b>39.3 %</b>
<b>Visitor</b>	79	<b>40</b>	-39	<b>49.4%</b>
<b>Total</b>	<b>552</b>	<b>327</b>	<b>-225</b>	<b>40.8 %</b>
<i>Bicycles</i>	197	197	0	0.0 %
<i>Accessible</i>	n/a	n/a	n/a	n/a
<i>EV-ready</i>	n/a	n/a	n/a	n/a

- By contrast, the number of spaces provided for bicycle parking (197) would comply with the current standard. There is no indication, however, of the number of accessible parking spaces or whether all spaces would provide charging stations for electronic vehicles.

Overall, this proposed reduction will produce significant savings for the Applicant. In the Greater Toronto Area, for example, the cost of building underground parking ranges from \$48,000 to \$160,000 per space, depending on soil conditions and related factors<sup>32</sup>.

- In order to achieve these savings, the Applicant’s planning rationale argues that the parking standard for residents should be reduced from the current minimum of 1.2 spaces per unit to 0.7 spaces. This ratio would correspond to the level of car ownership among apartment households in the Outer Urban Transect (some 66%). It would also match the maximum capacity of the two levels of underground parking (327 spaces).

**Spillover parking**

- As discussed in the previous section on transportation mode shares, the estimate of car ownership rates as low as 66% is likely too optimistic for this site in view of the existing transit network, and so may result in a spillover effect onto neighbouring streets.
- Unless adequate on-site parking spaces are provided, the new towers are likely produce significant “spillover” parking on adjacent streets. Even if on-street parking is permitted on North Bowesville Road, it may not be sufficient to address a potential shortfall of some 225 parking spaces in the towers.

<sup>32</sup> City of Toronto, *Recommended Parking Requirements for New Development (Nov. 2021)*, p. 12.  
<https://www.toronto.ca/legdocs/mmis/2021/ph/bgrd/backgroundfile-173150.pdf>



- Some 30 parking spaces could be provided on the east side of Bowesville Road, and additional spaces might be available on Uplands Drive. At the same time, the City might need to impose new parking limits on the nearby streets and step up parking enforcement in the vicinity of the towers.
- As an interim solution, the Applicant could lease space in the three-storey parking garage on the adjacent IBM site. This garage has been virtually empty since the start of the Covid-19 pandemic because many employees are now working remotely on weekdays.
  - *If the density of the proposed development is not reduced, the City should maintain the existing parking requirements for this site.*
  - *In the interim, the Applicant should consider leasing space in the nearby three-storey parking garage.*
  - *If the requested reduction in parking requirements is approved, the City should secure significant offsets from the Applicant, such as more “below market rate” units or a greater contribution to the Community Benefits fund. The City should also make provision for rigorous parking enforcement on the neighbouring streets.*

**Commented [PM3]:** Do you just mean compensation? Or some other offset like more affordable units?

## 6. Related Issues

### Commercial and retail services

- There is no provision for commercial or retail services on the ground floor of the proposed towers. Such services would support the City's ideal of a "15-minute neighbourhood" by encouraging residents and neighbours to shop locally.
- There are commercial and retail services at the small plazas on Riverside Drive, as well as the more extensive services on Hunt Club Road. Nevertheless, even a few services within convenient walking distance would help to reduce the use of vehicles.
  - *The City should consider applying a condition to the zoning by-law amendment that would encourage the provision of commercial or retail services on the ground floor of the towers.*

### Height Limits

- The height of the proposed towers is at the maximum allowable level under the current zoning.
- At the public meeting in June 2022, some residents expressed concern that the proposed height of 14 storeys would be inappropriate, in light of the proximity of the towers to the nearby low-rise residential area. A further increase in height would strengthen these concerns.
- The current height limit is based on the "obstacle limitation" requirements of the nearby Macdonald-Cartier International Airport. The height allowed by the airport zoning regulations is 151.79 metres above sea level, and the height of the proposed towers is some 150 metres above sea level (including rooftop mechanical units)<sup>33</sup>.
  - *The Applicant should consider alternative designs to execute their plan with a lower building height.*

### Transparency

- The significant changes to the original proposal were not highlighted in the Applicant's revised submission or summarized in the e-mail notice from the City planner. The only source of this information was Councillor Brockington's monthly newsletter and his verbal briefing to the HCCA.

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<sup>33</sup> *Planning Rationale*, p.22.

- The City’s “application summary” continues to refer to the details of the April 2022 proposal and the Applicant’s “planning rationale” has not been updated. Members of the public would need to read the fine print at the bottom of the site plan to learn the current number of proposed units and parking spaces.
- This lack of transparency makes it difficult for community members to assess the implications of revised submissions. Given the fact that such “back and forth” applications are routine, it would be helpful to improve the information available to interested parties.
  - *The City should request the Applicant to provide a brief summary of significant changes when submitting revised applications.*

### Planning Tools

- Community associations do not generally have access to urban planning expertise and must rely on information provided by the City of Ottawa regarding individual development proposals. There is no easy way, however, to access comparative data on similar proposals across the city (along the lines of this discussion paper’s “key comparisons” section).
- Although the City of Ottawa’s “Devapps” search tool enables members of the public to access supporting information for development applications, its usefulness could be enhanced in a number of ways. At present, supporting documents are simply listed in chronological order with no effort made to highlight key documents for non-technical readers. The City of Vancouver, by contrast, provides a user-friendly graphical interface to its planning portal.<sup>34</sup>
- Similarly, the “GeoOttawa” tool provides an interactive map of zoning across the City of Ottawa, but it provides only the most basic data in its zoning layer. The City’s “Digital Twin” project, currently under development, offers the potential for public access to detailed comparative data on planning applications across Ottawa. The City of Melbourne, Australia, for example, provides an easy-to-use visualization tool for development applications across its municipality.<sup>35</sup>
  - *The City should provide user-friendly access to development applications, and should implement a public version of its “Digital Twin” visualization tool as soon as possible.*

<sup>34</sup> <https://www.shapeyourcity.ca/2416-w-7-ave>

<sup>35</sup> <https://www.developmentactivity.melbourne.vic.gov.au>

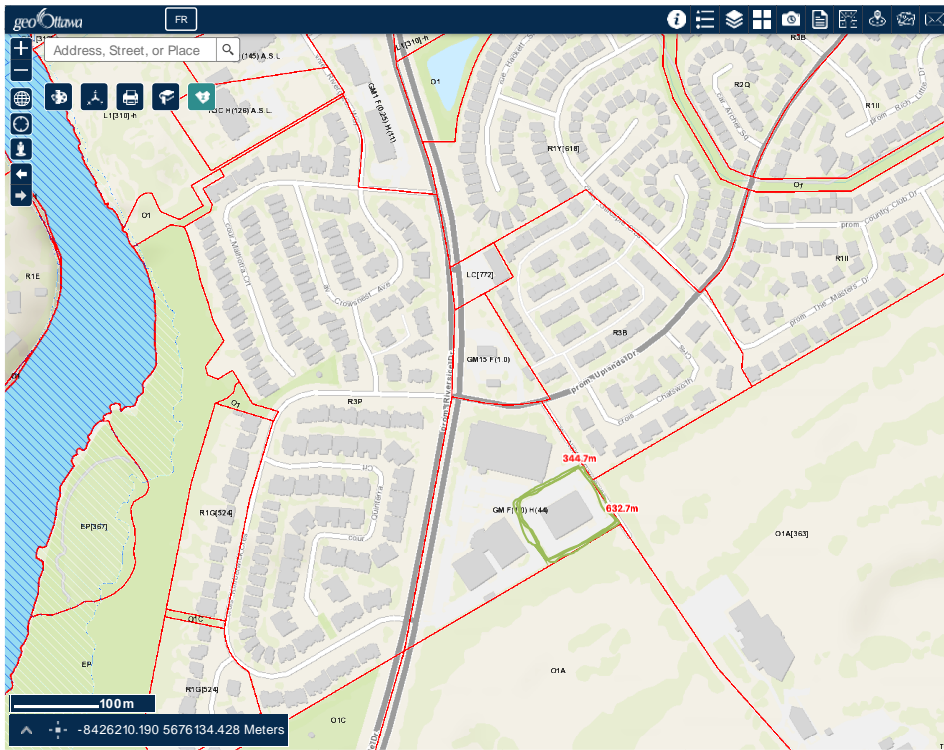
## 7. Alternative Scenarios

- In light of the current pressures to provide more housing, some version of the Tudor Hall proposal is likely to be approved by City Council. The existing zoning permits a height of 44 metres above ground (up to 14 storeys) and any reduction in this limit would run the risk of a successful appeal to the Ontario Land Tribunal.
- The Applicant, however, seeks amendments to the Floor Space Index and minimum parking standard which are comparable to high-rise developments in “Mainstreet” designations. It is appropriate for the City to consider alternative scenarios which would bring this proposal into line with other high-rise developments in River Ward.
- The City, for example, could approve an increase in the Floor Space Index to a level comparable to 770 Ridgewood Avenue (2.89) or to the apartment portion of 3930-3960 Riverside Drive (3.75). Alternatively, it could reduce the residential parking standard for this site from 1.2 to 1.0 (comparable to 770 Ridgewood). The effect of changes to these variables would be to encourage a less intensive development.
- In addition, the HCCA and the City should explore a number of ways to mitigate the impact of this proposal while still providing much-needed housing. These measures might include:
  - *Commitments by the Applicant to add affordable units to the proposed development, or to make a substantial contribution to the City’s affordable housing fund (beyond the required Community Benefit Charge);*
  - *Shared parking in IBM’s three-storey parking garage, which is now virtually empty;*
  - *Concrete commitments by the City to improve transit service and active transportation networks near the proposed development (e.g. through the Transportation Management Plan).*

## 8. Next Steps

- The original application, filed in April 2022, was revised in November 2022 in order to increase the number of units and to reduce the number of parking spaces. The Applicant is now considering further unspecified changes, and no date has been set for consideration by the City’s Planning and Housing Committee.
- The HCCA is prepared to meet with the Applicant to discuss the above issues. It will consult with Councillor Brockington and submit a position paper to City staff when the application is re-submitted.

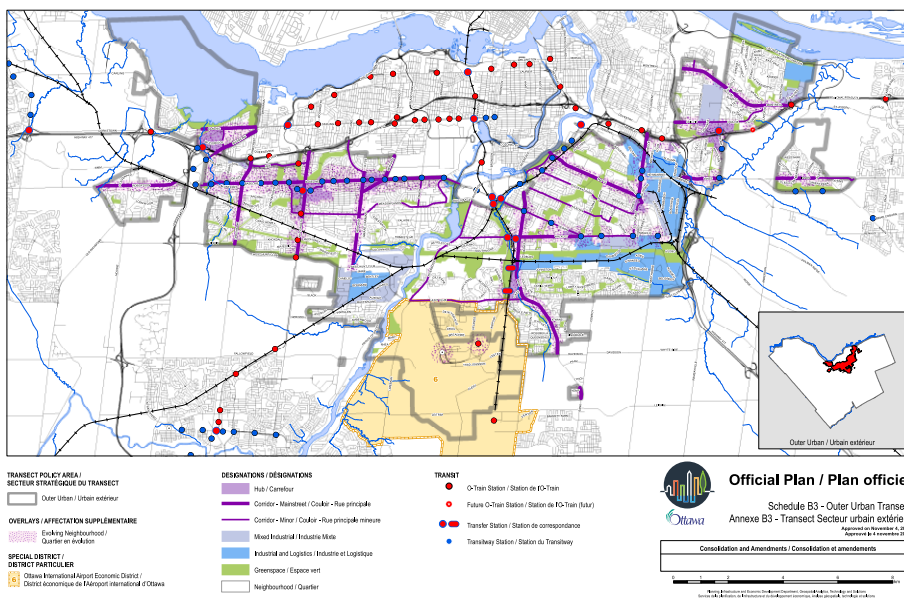
## Zoning Map



Source: GeoOttawa.



## Official Plan: Designations



Source: [https://documents.ottawa.ca/sites/documents/files/schedule\\_b3\\_op\\_bil.pdf](https://documents.ottawa.ca/sites/documents/files/schedule_b3_op_bil.pdf)

## River Ward: Key Comparisons

### Introduction

- In order to place the re-zoning application for 3750 North Bowesville into context, it may help to compare this project with other major developments in River Ward. This comparison could focus on several key factors: distance from rapid transit; comparative density (as measured by the Floor Space Index); and parking spaces per unit.
- There are currently six major development applications in River Ward for apartment towers which are 10 storeys or higher (*see Table 4*). All of these applications were filed in 2022 or early 2023 and have not yet been considered by the City's Planning and Housing Committee.
- In addition, this comparison includes two other high-rise projects: 780 Baseline Road (adjacent to River Ward) and 1420 Richmond Road (recently approved by the City's planning committee).

**Table 4**  
**Summary: Key Comparisons**

Address	Floor Space Index (FSI)	Parking / Res. Unit	Distance (LRT/BRT)	Designation (Official Plan)
1420 Richmond <sup>36</sup>	6.40	1.0	0.5 km	Mainstreet
1640-60 Carling	5.96	0.5	0 km	Mainstreet
<b>3750 N. Bowesville</b>	<b>4.89</b>	<b>0.7</b>	<b>4.2 km</b>	<b>Neighbourhood</b>
780 Baseline <sup>37</sup>	4.48	0.5	0 km	Mainstreet
1345 Baseline	4.47	0.5	0 km	Mainstreet
3930-60 Riverside	3.75	n/a	4.5 km	Minor Corridor
<b>729 Ridgewood</b>	<b>2.89</b>	<b>1.0</b>	<b>1.0 km</b>	<b>Neighbourhood</b>
<b>770 Brookfield</b>	<b>1.73</b>	<b>0.5</b>	<b>0.5 km</b>	<b>Neighbourhood</b>

<sup>36</sup> Approved by Planning and Housing Committee on April 23, 2023. This project is located in Bay Ward, but provides a close comparison to the Tudor Hall project: it proposes two 12-storey towers with 391 units.

<sup>37</sup> Located in Knoxdale-Merivale Ward, adjacent to a residential community in River Ward.



## Distance from Rapid Transit

The **St. Mary's** and **Tudor Hall** sites are by a large margin the furthest away from either Light Rail Transit (LRT) or Bus Rapid Transit (BRT) – some 4.5 and 4.2 km respectively. Since the St. Mary's site is located directly on Riverside Drive, it is designated as "Minor Corridor" under the new Official Plan. The Tudor Hall site, which is adjacent to a low-rise community, has been assigned a "Neighbourhood" designation.

**Table 5**  
**Distance from Rapid Transit**

Address	Distance (LRT/BRT)	Designation (Official Plan)	Units	Towers (storeys)
<b>3930-60 Riverside</b>	<b>4.5 km</b>	<b>Minor Corridor</b>	<b>500</b>	<b>4 (9-17)</b>
<b>3750 N. Bowesville</b>	<b>4.2 km</b>	<b>Neighbourhood</b>	<b>392</b>	<b>2 (14)</b>
729 Ridgewood	1.0 km	Neighbourhood	446	4 (4-20)
770 Brookfield	0.6 km	Neighbourhood	426	2 (6-9)
1640-60 Carling	0 km	Mainstreet	1,715	6 (9-40)
780 Baseline	0 km	Mainstreet	998	3 (28-32)
1345 Baseline	0 km	Mainstreet	952	3 (26-28)
1420 Richmond <sup>38</sup>	0 km	Mainstreet	391	2 (12)

By contrast, the two projects near Mooney's Bay are relatively close to existing LRT and BRT stations: **729 Ridgewood** (1.0 km) and **770 Brookfield** (0.6 km). These sites are designated as "Neighbourhoods" under the new Official Plan. Owing to its proximity to the LRT/BRT, the Brookfield site is also subject to an "Evolving Neighbourhood" overlay.

Three other projects are located on high-traffic arterial roadways which are marked as future LRT or BRT transitways: **1640-1660 Carling** (the former Canadian Tire site), **780 Baseline** (Zena Plaza, corner with Fisher), and **1345 Baseline** (Scouts Canada, next to the Walmart plaza).<sup>39</sup> These sites are designated as "Mainstreet Corridors" under the new Official Plan and, for good measure, the Scouts Canada site overlaps with a wider "Hub" designation.

<sup>38</sup> Approved by Planning and Housing Committee on April 23, 2023. This project is located in Bay Ward, but provides a close comparison to the Tudor Hall project: it proposes two 12-storey towers with 391 units.

<sup>39</sup> [https://documents.ottawa.ca/sites/documents/files/schedule\\_c2\\_op\\_bil.pdf](https://documents.ottawa.ca/sites/documents/files/schedule_c2_op_bil.pdf). Official Plan, Schedule C2, *Ultimate Transit Network* shows future plans for an "at grade" LRT route on Carling Avenue and a BRT route on Baseline Road. It is not clear whether or when these transitways will be constructed, but their appearance on Schedule C2 indicates the intensity of traffic on these arterial roadways.

The “Mainstreet” projects each feature 3-6 towers, the highest of which range from 28 to 40 storeys. The “Minor Corridor” project (St. Mary’s) proposes 4 towers, ranging between 9 and 17 storeys. Within the “Neighbourhood” designation, the Brookfield project is the second phase of an existing complex and seeks approval of two new buildings (6 and 9 storeys).

The “Brigil” project at 729 Ridgewood was the subject of extensive consultations with the Riverside Park community. In response, the development proposal has been adjusted significantly by moving the high-rise tower, increasing its height to 20 storeys, and reducing the height of the mid-rise buildings to 4-6 storeys.

### Floor Space Index

The density of a project is measured by the Floor Space Index (FSI), which divides the gross floor area by the total site area.

A comparison of major high-rise developments shows that the Tudor Hall proposal features the second highest density (4.89) in River Ward, comparable only to the four “Mainstreet” sites which are located on future LRT or BRT transitways.

By contrast, the other two “Neighbourhood” proposals feature much lower density: 729 Ridgewood (2.89 FSI) and 770 Brookfield (1.73 FSI). Even the towers at the St. Mary’s site have a lower density (3.75), excluding the detached dwellings and townhouses.

**Table 6**  
**Floor Space Index**

Address	Floor Space Index (FSI)	Total Site Area	Gross Floor Area	Designation (Official Plan)
1420 Richmond	6.40	5,135	32,756	Mainstreet
1640-60 Carling	5.96	22,998	137,079	Mainstreet
<b>3750 N. Bowesville</b>	<b>4.89</b>	<b>6,820</b>	<b>33,394</b>	<b>Neighbourhood</b>
780 Baseline	4.48	14,294	64,057	Mainstreet
1345 Baseline	4.47	13,132	58,870	Mainstreet / Hub
3930-60 Riverside	3.75	13,192	49,454	Minor Corridor
<b>729 Ridgewood</b>	<b>2.89</b>	<b>13,328</b>	<b>38,499</b>	<b>Neighbourhood</b>
<b>770 Brookfield</b>	<b>1.73</b>	<b>14,294</b>	<b>42,629</b>	<b>Neighbourhood</b>

## Parking Spaces

Of the eight proposals under review, four are subject to a minimum parking standard of only 0.5 spaces per residential unit. These are the four “**Mainstreet**” sites closest to existing or future LRT/BRT transitways. (Even so, the 1420 Richmond Road project – which is near the Lincoln Fields LRT station – provides a 1:1 ratio for residential spaces).

The **St. Mary’s** site is within Area C, which requires 1.2 residential spaces per unit, but the current re-zoning application does not specify the number of proposed parking spaces for the apartment towers.

As a result, the **729 Ridgewood** proposal is the only one subject to the same minimum parking standard as the Tudor Hall proposal (1.2). It seeks a slightly reduced parking standard for residents (1.0) but proposes to provide *double* the number of required bicycle spaces per unit (1.0 instead of 0.5).

The **Tudor Hall** proposal, in comparison, seeks a parking standard (0.7) which is much closer to those of the Mainstreet sites (0.5) which are located on or near LRT and BRT transitways. It is also the only application to provide a reduced number of visitor spaces (0.1 instead of 0.2), and it does not increase the number of bicycle spaces per unit (0.5)<sup>40</sup>.

**Table 7  
Parking Spaces Per Unit**

Address	Residential (Required)	Residential (Proposed)	Diff.	Designation (OP)
<b>729 Ridgewood</b>	<b>1.2</b>	<b>1.0</b>	<b>-0.2</b>	<b>Neighbourhood</b>
<b>3750 N. Bowesville</b>	<b>1.2</b>	<b>0.7</b>	<b>-0.5</b>	<b>Neighbourhood</b>
3930-60 Riverside	1.2	n/a	n/a	Minor Corridor
770 Brookfield	0.5	0.5	0	Neighbourhood (near LRT)
1640-60 Carling	0.5	0.5	0	Mainstreet (on BRT)
780 Baseline	0.5	0.5	0	Mainstreet (on BRT)
1345 Baseline	0.5	0.5	0	Mainstreet (on BRT)
1420 Richmond	0.5	1.0	+1.0	Mainstreet (near LRT)

<sup>40</sup> The Scouts Canada proposal for 1345 Baseline complies with the parking standard for residents and visitor vehicles, but provides *three times* as many bicycle spaces as required (1,555 vs. 476).

## Downtown Core: 18 Louisa Street

In addition to the above comparisons, there is useful information available about an apartment tower which the same developer proposes to build in Centretown West. In May 2022, City Council approved a re-zoning application by Keith Jennings for a mixed-use building at 18 Louisa Street, near Gladstone and Bronson Avenues<sup>41</sup>.

As shown in Table 8 below, the proposed density of the Tudor Hall project (*FSI 4.89*) is much greater than that of the Louisa Street building (*FSI 3.0*), even though the latter is located in a densely populated neighbourhood within 800 metres of the new LRT station on Gladstone Avenue.

**Table 8**  
**Density Comparison: 18 Louisa Street and Tudor Hall**

	<b>18 Louisa Street</b>	<b>3750 N. Bowesville Road</b>
Transect Policy Area	Downtown Core <sup>42</sup>	Outer Urban
Designation	Evolving Neighbourhood	Neighbourhood
<b>Distance from LRT</b>	<b>800 metres</b>	<b>4.2 kilometres</b>
Storeys	9	14
Residential units	139	392
Total site area	3,260 sq. metres	6,820 sq. metres
Gross floor area	9,821 sq. metres	33,394 sq. metres
<b>Floor space index (FSI)</b>	<b>3.0</b>	<b>4.89</b>

<sup>41</sup> <https://devapps.ottawa.ca/en/applications/D07-12-21-0102/details>

<sup>42</sup> Official Plan, Schedule B-1. [https://documents.ottawa.ca/sites/documents/files/schedule\\_b1\\_op\\_bil.pdf](https://documents.ottawa.ca/sites/documents/files/schedule_b1_op_bil.pdf)