



Monday, June 30th, 2025

To: New Zoning By-law planning staff (newzoning@ottawa.ca)

RE: Submission on Draft 2 of the New Comprehensive Zoning By-law

By: Peoples Official Plan Coalition (POP)

This submission by the People's Official Plan Coalition (POP) provides our feedback, comments and recommendations in response to Draft 2 of the proposed New Comprehensive Zoning By-law.

The [Peoples Official Plan \(POP\) coalition](#) is composed of over 20 not-for-profit organizations representing tens of thousands of Ottawans. We advocate at Ottawa City Hall for better transit, greater walkability and active transportation, greenspace for all, housing equity, climate change mitigation and adaptation, equity and inclusion, sustainable waste management, and food security, all sought through ethical city planning practices.

Overview of Key Concerns

POP strongly supports a compact, green, caring and livable city as an important and viable alternative to the high financial costs and detrimental climate impacts of the sprawl model of urban growth. As Ottawa continues to adapt to increasing intensification in the face of accelerating climate change and housing demand, we recognize the immediate need for zoning to support the threatened urban tree canopy, equitable and affordable housing, and healthy communities.

For Draft 3 of the by-law, we are concerned with improving several provisions to ensure equitable housing opportunities with respect to rentals, demographic needs, emergency and temporary housing and 15-minute neighbourhoods. Our vision is for a 15-minute caring city as described in the [policy paper](#) by CAWI.

As Ottawa moves to enable greater density through the new comprehensive zoning by-law, it is vital to recognize that upzoning can also trigger displacement—especially when older, affordable housing is replaced by higher-end developments. To avoid deepening housing insecurity, we strongly support pairing these zoning changes with robust anti-renoviction and anti-demoviction measures. We encourage the Planning Department to adopt this dual approach to ensure densification is equitable and inclusive.

In Draft 3 we also hope to see provisions strengthened that create and preserve soft landscaping minimums in neighbourhood zones and parking lots, adequate setbacks city-wide including alternative setbacks for tree retention, and stronger links between soft landscaping for trees and stormwater management. Our recommendations for trees and greenspaces are supported by the research presented in the [Trees and Zoning position paper](#) by CAFES Ottawa.

We appreciate that there is a noticeable start to integrating a food systems lens taken throughout Draft 2 of this bylaw. We seek to strengthen that lens, as per the Council-directed priority 1.1.2 of the Poverty Reduction Strategy Food Security pillar to integrate a food security lens into City-led strategies and plans. As part of this, we want to ensure strong inclusion of enabling policies for urban and rural food production and sale, which we have outlined as they pertain to this particular bylaw throughout the document that follows.

Recommendations

Section 201 - Stormwater Management

POP continues to support the new zoning provisions that require on-site stormwater management where there is an increase in impermeable surfaces that control peak run-off to pre-development levels. We support the provisions that building developments may be delayed if IMP capacity studies demonstrate that stormwater is limited; or developers could fund local improvements.

The by-law must take a coordinated approach with the Low-Impact Development strategies that have been implemented in the IMP's policy statements. See [CAFES letter](#) from August 2024, which recommended clearer IMP policy statements that green infrastructure must be used for stormwater management and climate mitigation, in accordance with the new Ontario government's [Provincial Planning Statement](#).

Recommendations for Draft 3:

- We suggest including a permission for stormwater infrastructure to be located under hard landscaping, including pavement or driveways, so as to not interfere with the soft landscaping portion of the yard that should be reserved for trees. Locating stormwater infrastructure underneath the hard landscaping portions of the front yard will ensure the soft landscaping portions of the yard are unobstructed and can accommodate trees.
- In cases where stormwater infrastructure does have to be located in the soft landscaped portion of the yard, provisions should require 30 m³ soil volume at 1 m depth above underground stormwater infrastructure. Adequate soil volume above stormwater infrastructure will ensure tree roots have room to grow without interfering with utilities; likewise, this minimizes risk to the tree if underground utilities require maintenance.

Section 208 - Community Amenity and Public Space

Amenity areas are an important policy area for ensuring equitable access to public space. As neighbourhoods support greater density, the inclusion of public space becomes critical from a livability and sustainability perspective.

Recommendations for Draft 3:

- Outdoor amenity areas should be an addition to all landscaping requirements and all setbacks and not include landscape provisions or setbacks within the sq m calculation of the amenity area.
- An indoor and outdoor amenity area should be provided in all residential buildings greater than 8 units.
- Flexibility should be applied regarding the provision Section 208 (3) that requires an amenity area to be located on the same lot. In instances where multiple developments can combine their amenity to provide a greater public good, this should be permitted and encouraged.
- The provision of 6 sq m of amenity area per residential dwelling should be applied based on an equity index. In neighbourhoods underserved by parks or community spaces, the requirement for amenity areas should be increased.

Section 210 - Provisions for Underground Structures

We continue to support the requirement in Draft 2 to have 30 m³ of soft landscaping with 1 – 1.5 m depth above underground structures in rear yards, with the intent on providing space for a canopy tree. The 1 m minimum depth will ensure the soil depth does not go too deep thus reducing the amount of surface area.

For reference, as per the [CAFES Trees and Zoning position paper](#), trees require the following minimum soil volumes and surface area measurements.

Size of Tree	Height at Maturity	Soil Volume	Surface Area (1 m depth)
Small	5–9 m	10 m ³	3.2 x 3.2 m
Medium	10–15 m	30 m ³	5.5 x 5.5 m
Large	15 + m	50 m ³	7 x 7 m

Recommendations for Draft 3:

- We understand this provision was changed in Draft 2 to only apply in rear yards as many front and side yards are too small for 30 m³. Though ideally we would like to see this requirement applied everywhere, we suggest this requirement for rear yards be carried forward into Draft 3.
- Rather than the maximum 1.5 m depth, we suggest including minimum surface area requirements for the soil volume, of 5.5 x 5.5 m at 1 m depth, overtop underground structures to ensure adequate volume for a medium canopy tree.
- While the notes refer to "... underground structures that are part of a building, such as underground parking structures", there are numerous other underground structures, such as front and rear porches and entrance stair structures, as well as

front yard basement window wells and basement entrances, that must also be regulated so as to not inhibit a mature tree's critical root zone. The solution is to cantilever these structures, as per Section 204 (7) (a) (i), or regulate these structures to be founded on piers as opposed to continuous underground foundation walls.

Section 214 - Alternative Setbacks for Tree Retention

POP supports the provision to reduce building setbacks elsewhere on the lot when a building or lot needs to be adjusted in order to retain a protected tree, according to the Tree Protection By-law. We applaud this conditional flexibility where zoning responds to local conditions and recommend this provision is carried forward into Draft 3.

Recommendations for Draft 3:

- We suggest the planning team consider adding language into the provision that requires an arborist report to outline specific site/development conditions that would be required for the retained protected tree to survive, and not result in damages from development.
- We suggest carrying forward Draft 2's use of the term "protected" tree to align with the Tree Protection By-law.
- The diagram is not to scale - The lot is scaled to be a 15m X 30 m lot. The front yard setback is depicted to be 9 m (instead of a more appropriate 3 m to 6 m) and the side yard setbacks are depicted to be 3 m on both sides – for a total of 6 m (instead of a total 1.8 m or 2.4 m). The building footprint is not the footprint that can be expected for any infill development. The small (approx. 1 m wide) 'slivers' of "equivalent massing" do not reflect the proposed permissions.

Section 217 - Waste Management

POP supports accessible, equitable and adequate waste storage. We support the new section introduced in Draft 2 on waste storage for residential and mixed-use buildings, including dedicated waste storage areas for recyclables, organics and garbage, with garbage and organics being located inside closed buildings or outside if in metal containers.

We support that in neighbourhood zones it must be accessible by a functional path of travel. We suggest the size of storage areas be carried forward (6 dwellings or less there's no minimum; 6–10 dwellings must have 5 sq m waste storage; 10 dwellings or more must have 10 sq m waste storage).

We want to ensure neighbourhood-based compost systems, operated in accordance with established operational and management standards, are allowable structures. Small compost systems such as this should be operated along the lines of typical backyard garden composts. This is in line with the circular economy principles of the Solid Waste Management Master Plan.

Section 302 - Short Term Rental

Secondary suites are an opportunity to provide rental housing in all residential zones across the City. POP supports the permissive nature of secondary suites within this by-law; however, secondary suites for the purposes of permanent rental housing should be incentivized over temporary uses such as vacation rentals.

Recommendations for Draft 3:

- Introduce incentives for secondary suites secured as permanent rental housing (for example, consideration for minor height relaxations).

While the Zoning By-law does not provide requirements for tenant relocation plans, we believe this is essential and something that should be resourced adequately. In addition, the right of first refusal should be offered to tenants who are required to relocate due to upzoning of their home.

Section 307 - Car-Sharing Services

Car sharing promotes environmental sustainability by reducing the number of vehicles on the road and supporting car-free lifestyles in urban areas. Studies suggest that one shared car can replace up to 15 privately owned cars, thereby decreasing traffic congestion and lowering carbon emissions. They allow residents to access a variety of vehicle types when needed without requiring personal car ownership or dedicated parking spaces, thus reducing parking needs in residential areas. Car sharing not only provides economic and environmental benefits but also contributes to more efficient use of urban spaces.

As the Zoning By-law is eliminating parking minimums, there will be increasing pressure for parking spaces in neighbourhoods. Well-functioning car-sharing services can alleviate this pressure as many residents will not require a private car.

Despite zoning to build a denser city, if public transit continues to not function adequately, residents will continue to be car-dependent, meaning air quality will worsen. Well-functioning car-sharing services in all parts of the city have many benefits and should be incentivized by zoning.

The city is currently served by Communauto, a Canadian company head-quartered in Montreal. Communauto has a fleet of 240 cars in Ottawa, 40% are hybrid, 2% are EVs. Communauto is pleased with the results of their EV pilot and interested in expanding this fleet segment. Communauto has a positive relationship with Ottawa Community Housing and plans to expand the number of shared cars stationed at OCH buildings. Zip-car, an American car-sharing company made a beachhead in several Canadian cities including Ottawa a few years ago but withdrew subsequently. With the exception of a couple of cars stationed in Bells Corners, Communauto is currently serving Ottawa only inside the greenbelt and significant expansion potential exists with regard to Ottawa's suburban and rural areas.

Recommendations for Draft 3:

- Permit car-sharing spaces to occupy any parking space (not restricted to principal use or accessory use parking lot or parking garage). Our intent here is to allow car sharing companies to rent parking spaces from willing residents. It is our understanding that 'renting out' permitted residential parking spaces is currently not permitted.

Section 309 - Food Production

We again note appreciation for the broadened permissions outlined in Draft 2 of this bylaw update. There continue to be gaps with broad policy that impacts urban, suburban and rural villages.

Recommendations for Draft 3:

- Review to increase accessibility to food production by residents in urban, suburban and rural villages.

Section 501 - Flood Plain Overlay

It is our view that this section requires a full review with a desired outcome of preventing very costly flood damage in the medium to long term and avoiding legal liabilities.

Context: The City's 2022 Climate Vulnerability and Risk Assessment predicts worse flooding as climate change accelerates. More intense rainfall events combined with melting snowpack means a higher risk of spring riverine flooding in both urban and rural areas. Overland flooding from extreme weather intense rainfall is just as serious, generating a higher proportion of home insurance claims than riverine flooding. Given the significantly worsening trends of climate instability, flood damage prevention is a highly cost effective component of adaptation. See FAO for estimates of prevented costs by making preventative adaptation investments.

Taking action through regulatory means to prevent future flood damage is the most cost effective approach. Infrastructure and stormwater management approaches are expensive. Regulatory clarity in ZBL can also reduce potential municipal legal liability for flood damages.

Authorities and regulatory context. It is our understanding that the Planning Act gives zoning by-laws the jurisdiction to prohibit new development in the flood plain and to mitigate flood risks. Municipalities are also delegated the responsibility under the [Emergency Management and Civil Protection Act](#) of identifying areas subject to natural hazards and developing management plans to limit exposure to public health and safety risks. This includes identifying floodplains in municipal plans and incorporating policies to address new development consistent with the [Provincial Planning Statement](#). The PPS requires:

- Municipalities' planning authorities shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards [includes floods].
- Potential risks to public health or safety or of property damage from natural hazards and human-made hazards, including the risks associated with the impacts of climate change will be mitigated.

Ongoing work and identified flood-prone areas: The City is finalizing its **Climate Resiliency Strategy** which will be underpinned by an action/implementation plan. Three types of mapping exists (with updating under way) for identifying flood-prone areas:

- 1-in-100 year flood maps
- 1-in-350-year flood plain maps and
- Overland flood maps/risk assessments (as part of the Wet Weather Infrastructure Management Plan)

Recommendations for Draft 3:

- Review entire section, possibly as a separate municipal enterprise risk management exercise
- Increase scope of section 501 to all three types of flood-prone areas (1-in-100; 1-in-350, overland flood-risk areas)
- Maximize the restrictiveness of provisions in order to prevent any development in flood-prone areas and sun-set the exemptions.
- Consider Official Plan Amendment to align OP with PPS for flood hazard risk management and flood-damage prevention
- Basement construction permits be refused in areas identified as flood-risk for overland flooding
- Review alignment and adjacency of PPS, ZBL, Site Plan Alteration By-law, Conservation Authorities Act, the Environmental Assessment Act, Low Impact Development draft regulation and other relevant acts and regulations, respecting:
 - Prohibition of placement of fill in floodplain areas and
 - Preparation of land for development
 - Protection of natural systems including wetlands from development
 - Stormwater management using existing natural capital assets

With an objective of providing more clarity and coordination through Ottawa's ZBL.

Section 602 – Maximum Parking Space Rates

POP seeks a reduction of some car-parking maximums for Shopping Centres. Box-store development fosters urban sprawl, which typically entails large-scale destruction of natural spaces, encourages automobile dependency, and results in financial unsustainability. According to [an analysis by Walkable Ottawa](#), the current maximums for Areas C and E in Section 602 of Draft 2 are not attained in existing box stores, and thus the maximums proposed would have no effect in fulfilling our commitments in the Official Plan of reducing car dependency, shifting to sustainable transportation, and improving accessibility for all Ottawans.

Recommendations for Draft 3:

- POP therefore recommends that the car-parking maximums for Shopping Centres in Areas C and E be reduced to 2 per 100 m² of gross floor area, and that these maximums be applied across the Areas, and not just within 600 metres of existing and funded rapid transit stations.

Sections 604–606 - Parking Location and Spaces

POP is in strong support of **no** minimum parking requirements. The removal of parking minimums promotes sustainable public transportation and reduces development costs. This will allow builders a choice-based approach to determine the amount of parking to provide based on factors like proximity to transit stations and prioritizing soft landscaping. POP is in support of eliminating parking requirements city-wide, including in rural zones and rural villages.

POP strongly supports wheel strip driveways with permeable strips down the centre, options for shared driveways between two lots, and 3m maximum single-lane driveway widths.

Recommendations for Draft 3:

- POP recommends carrying forward **no** parking minimums into Draft 3, and applying this city-wide including in rural zones.
- Carry forward the permissions for permeable wheel strip driveways, shared single-lane driveways and 3 m driveway widths.
- Permit the option to install permeable pavement for any parking spaces and driveways in order to increase stormwater attenuation.
- While staff have stated that soft landscaping minimums required in other zoning provisions already mean that parking cannot supersede soft landscaping and thus space for trees, we believe there needs to be clearer language in this section that reinforces that the soft landscaping minimums must be met and that **parking cannot supersede these minimums**.

Section 607 - Parking Lot Provisions

We support the inclusion of soft landscaping minimums for principal or accessory use parking lots, however we suggest they are strengthened in Draft 3. We are in support of transitional communal parking lots in neighbourhood zones as a way to increase infill housing opportunities.

Recommendations for Draft 3:

- POP recommends increasing the soft landscaping minimum for all principal and accessory use parking lots to be 30% of the lot area.

- We recommend Draft 3 carry forward the requirement for a soft landscaped buffer with 3.5 m minimum width for 10–100 spot lots, and a 5 m minimum width for 100+ spot lots.
- We suggest including a minimum required soil volume of 30 m³ at 1 m depth for soft landscaping areas and soft landscaped buffers and in addition to the minimum width and depth requirements.
- While we understand that lots can take many forms and that permeable features can be in the form of islands, medians or pathways, we suggest including a provision that the soft landscaped areas are contiguous where possible for the intent of providing shared soil volumes for large canopy trees.
- We recommend an option to permit permeable pavements in surface parking lots, including transitional communal lots.
- Amend subsection (1)(b) to permit transitional communal parking lots as a transitional use in Area B - Inner Urban Transect.

Section 708 - Housing to Meet Demographic Need

This policy must reflect the needs and diversity of households and include provisions to permit multi-generational and multi-family living within the same home. There is a lack of affordable 3+ bedroom units in Ottawa, which means large families, newcomers, and multi-generational families live in overcrowded and cramped apartments.

Recommendations for Draft 3:

- Section 708 (1), permits the inclusion of at least 5% of dwelling units to have at least three bedrooms or a minimum gross floor area of at least 80 sq m. Maintain in draft 3 that in mid to high rise buildings, at least 5% of dwelling units must have 3+ bedrooms; and in low rise buildings 450 sq m or more, 15% of dwelling units must be 3+ bedrooms.
- Require a large percentage of these units to be ground oriented to ensure accessibility for seniors, mobility aids, or strollers

Section 801 - Neighbourhood Zones - 15-Minute Care Zones

POP would like to see the 15-minute neighbourhood approach include more than just retail and leisure. Section 801 appears to “conditionally permit nonresidential uses, so as to permit a range of services in proximity to permitted high-density residential areas to implement the 15-minute neighbourhood policies of the Official Plan” in mid- and high-rise zones (N5 and N6). An integral part of what makes neighbourhoods thrive is care services. Zoning for care use, as a more specific usage of nonresidential or commercial zoning, is integral in achieving functional 15-minute neighbourhoods.

Recommendations for Draft 3:

- We support that some care services including medical facilities, daycares and community centres are proposed to be permitted in N5 and N6 zones and suggest this is carried forward.
- A fine grained approach such as the use of a suffix or an overlay as a tool to exclusively zone for care services should be considered to ensure that critical services are provided. Use of this type of tool would ensure care services (listed on page 11) are not competing with other permitted uses, specifically commercial enterprises.
 - Consider how the -c suffix, which permits medical facilities and offices, can be applied in inner urban, outer urban, suburban transects near schools, community centres and parks.
- The 15-minute neighbourhood zoning approach must demonstrate linkages with the need for complete streets, walkability, shade and cooling from canopy trees (achieved through setbacks and soft landscaping), and greenspaces.

Section 801 - Neighbourhood Zones (N1–N6) - Setbacks

The overall objective of Ottawa's OP is livability. As summer heat waves are forecast to increase significantly with accelerating climate change, and the urban heat island effect magnifies and radiates this heat, and the adverse health impacts are well documented, the importance of medium and large size shade-giving trees is increasing. Planning staff have acknowledged how important setbacks are for trees.

We propose that in all areas of Ottawa, there should be a new provision with a minimum standard where the front yard setback plus the depth of permeable ROW totals a minimum of 6 m. This would allow for a medium size tree in a street facing position creating a public amenity, helping with cooling and creating habitat. This will also create benefits regarding on-site stormwater absorption.

We further propose that for tall buildings situated in any zone on lot sizes of width greater than 15m there should be a minimum front yard set-back of 6m to create livability, amenity space and space for large trees.

POP acknowledges that minimum front yard and exterior side yard setbacks in the neighbourhood zones (N1–N6) are currently 3m (subzones A and B), 4.5m (subzone C) and 6m (subzones D, E, F). We acknowledge that the minimum rear yard setbacks were changed to be 25% of lot depth, as staff say this will be easier to apply, and will allow a consistent approach for including amenity areas and soft landscaping in rear lots.

Recommendations for Draft 3:

- This section should include a new overarching provision that requires each lot in any subzone to be paired with permeable ROW space that together with the setback, totals a minimum of 6m. This will ensure that in areas of the city with smaller

setbacks, a medium shade tree can still be planted in the shared soil volumes of the ROW and the lot combined.

- POP recommends the following metrics for front and exterior side yard setbacks:
 - For subzones A and B, setbacks should be 3m from the lot line; except in cases where the lot width is larger than 15m, in which case the setbacks should be 6m.
 - For subzone C, setbacks should be 4.5m from the lot line; except in cases where the lot width is larger than 15m, in which case the setbacks should be 6m.
 - For subzones D, E and F the setbacks should continue to be 6m.

Section 801 - Neighbourhood Zones (N1–6) - Communal Parking Lots

The current standard for parking to be located on the same lot as the use in Neighbourhood Zones creates a limitation when striving for neighbourhood-level shared parking solutions. We support transitional communal parking lots as an important tool for meeting the city's housing goals by enabling and encouraging more infill housing opportunities. Transitional communal parking lots will help manage parking needs and allow more housing to be built in existing neighbourhoods. By making them transitional, they can be converted to more housing once a neighbourhood becomes walkable and adequately serviced by public transit. The Zoning By-law could specify who is permitted to use the lots, conditions that are required for them to maintain neighbourhood character (eg. only located on interior lots with fencing), minimum soft landscaping requirements, and stormwater management.

Recommendations for Draft 3:

- Add subsection 4 to Section 801 that permits communal parking lots as a transitional use in N1 - N6 Zones.
- The transitional communal lots should be permitted on lots not within 500 m of a rapid transit station or frequent stop; should be used by residents in multi-unit buildings within 400 m of the property; should be located on interior lots only; have a maximum of 14 parking spaces
- Any part of the lot not occupied by parking spaces or the driveway should be soft landscaped. The minimum soft landscaped areas should be 30% of the total lot area with a minimum soft landscaped buffer of 3.5 m and a minimum soil depth of 1m, to provide space for trees.
- Permit permeable pavement to be used as the lot surface in order to provide stormwater attenuation.

Section 802 - Additional Neighbourhood Zone Provisions

Soft landscaping minimums in front and rear yards are among the most important provisions for allowing space for canopy trees. We are seeking to understand why Draft 2 removed

Draft 1's requirement to have 30 m³ of soil volume in rear yards. This was an excellent inclusion that would provide adequate growing space for medium-sized shade trees in each rear yard.

We **do not** support the change in which outside of Transects A and B, rear yard soft landscaping is only required in cases where there is rear yard parking. All transects should require soft landscaping in rear yards as a percentage of the total yard area; this is especially important to off-set hard landscaping - and the associated risks of heat and flooding - with soft landscaped permeable space for both trees and stormwater attenuation.

Recommendations for Draft 3:

- POP recommends increasing front yard soft landscaping minimums in all Neighbourhood Zones to be 50% of the total front yard.
- We recommend that in all other Transects outside A and B, minimum rear yard soft landscaping should be 50%.
- Minimum 30 m³ soil volume at 1 m depth should be brought back into the soft landscaping minimum requirements for rear yards in Draft 3.
- While we understand zoning cannot regulate the planting of trees, clear language should be incorporated into the provision that describes the *intent* to create space for trees through the soft landscaping minimums.

Recommended addition to Zone Provisions:

- POP suggests inclusion of the following additions to Zone Provisions 3), Where a front or exterior yard is greater than 1 m in depth, that yard must contain any of:
 - Accessible parking (stroller or mobility aid)
 - Children's play elements
 - Public art
- We suggest the inclusion of an additional provision where, in all Mixed-Use zones located adjacent to a transit stop, benches, street furniture, or other similar features are required for public use.
- Zoning should consider prohibition on fences in Mixed-Use zones to ensure active street frontages.

Sections 901-907 - Setbacks for Trees and Amenities in Hub Zones, Mainstreets and Minor Corridors

POP supports including minimum 3m front and exterior side yard setbacks across all Hub Zones, Mainstreets, Minor Corridors and Mixed-Use Zones. These zones are dense, busy areas that are among the most important areas to have large shade trees due to heat island effects. Having space for large canopy trees in these areas are essential for cooling, walkability, mitigating carbon emissions, increasing biodiversity, and enhancing community health and wellness.

Setbacks are especially important in Mixed-Use Zones where Staff have explained that these zones are intended to support 15-minute neighbourhoods - an essential component of 15-minute neighbourhoods is equitable access to shaded, walkable streets with greenspaces.

Setbacks are also important here to provide space for bicycle parking, outdoor patios, amenity space, planters, permeable space for stormwater attenuation, etc.

Recommendations for Draft 3:

- We recommend increasing front and exterior side yard setback size to a minimum of 3m for all Hub Zones, Mainstreets and Minor Corridors, and 6m where possible.
 - Where setbacks cannot be increased, **small setbacks of 6 m or less must be complemented by large permeable Right of Way space that can accommodate large canopy trees.** We understand it is difficult to draft the by-law to have conditional flexibility (i.e. if there is a generous ROW, then the set-back can be less because there is sufficient permeable/tree planting space). In some situations this may require depaving – an approach supported by the Urban Forest Management Plan, phase II.
- We recommend carrying forward 3m front yard setbacks in Mixed-Use Zones with clear language that explains the intent to create space for trees for the purpose of creating healthy, accessible 15-minute neighborhoods.

Sections 906-908 - Care Services in Minor Corridors and Mixed-Use Zones

We would like to see a provision included in all mixed-use zones for the inclusion of care, wellbeing and food security services to ensure community needs are provided for.

Recommendations for Draft 3:

- The care service overlay or suffix proposed above should also apply to Sections 906 and 907 Minor Corridors and Section 908 Neighbourhood Mixed Use Zone (NMU).
- The permitted uses for these zones could be expanded to include all of the following, if not already there:
 - Daycare, eldercare
 - Public washrooms
 - Schools, continuing education centers
 - Libraries
 - Arts and cultural centers, and museums
 - Medical and ancillary services
 - Mental health services
 - Legal services
 - Laundromats
 - Community recreation
 - Community gardening assets (plots, greenhouses, tiny forest, etc.)
 - Farmers' markets, food banks and community food sharing outlets

- Retail of products catered to care and wellbeing, including but not exclusive to food (both permanent and pop-up)
- Social services
- Youth services
- Parkland
- Veterinary clinics

Section 908 - Neighbourhood Mixed Use and Section 1003 Mixed Industrial Zone: Employment focused zones

The Neighbourhood Mixed Use and Mixed Industrial Zones have the ability to function as important employment centres. Depending on context, it may be appropriate to provide amenities and services that benefit and support employees. For example the provision of a childcare centre on the edge of a Mixed Industrial Zone adjacent to a garden centre or in the Neighbourhood Mixed Use zone adjacent to a broadcasting studio, may be an appropriate land use and would provide an important service for employees. Further, the ability for employees to access food options and greenspace is critical.

Recommendation for Draft 3:

- Expand the list of Conditional Uses to include the following:
 - Retail
 - Recreation
 - Park/greenspace
 - Day care
 - Office - co-working

Section 1102 - Recreation Zone

POP supports the opportunities for co-location of housing in community centers, libraries, and recreational and athletic facility buildings. Caring 15-minute neighbourhoods thrive when housing is co-located with care services such as those listed. To better support 15-minute neighbourhoods, incentives should be added to prioritize affordable housing and nonprofit housing provision to be co-located with City-run and City-owned space.

Recommendations for Draft 3:

- Language suggests support for introducing opportunities for co-location of housing in community centers, libraries, and recreational and athletic facility buildings. The same provision should be applied to Places of Worship to allow for co-location of housing.
- Include all models of community gardening and community greenhouses on the list of permitted Non-Residential uses.

Additional Considerations

Preservation of Rental Stock

Rental protections are critical to ensuring affordability. We recognize the tools are limited to ensure existing rental stock is maintained. Should a zone for purpose-built rental, in addition to what is permitted under Inclusionary Zoning policies, be permitted in the future, we believe the Zoning By-law should be amended to include such a zone. The following recommendations should be considered to ensure protection of critical rental housing stock in our City.

Recommendations for Draft 3:

- Consideration of site-specific factors on lots that are providing affordable rental housing. These factors may include:
 - Prohibition of upzoning on lots that are currently providing purpose-built rental for 8 units or greater.
 - Prohibition of upzoning on any lot that includes a residential development (8 units or greater) with a vacancy rate between 0–3%.
 - Prohibition of upzoning on any lot that is currently managed by a non-market, community or non-profit housing provider
 - As a similar type of tool as a Streetscape Character Analysis where neighbourhood context is taken into consideration as a component of development, we would like to see Neighbourhood Needs Assessments conducted in mid to high-density neighbourhoods. This assessment should consider how new development is contributing to the unique needs of the neighborhood. For example, what does the neighbourhood need in terms of publicly accessible amenities, parks, recreation, grocery stores and care services?

Inclusionary Zoning

Inclusionary Zoning is an essential tool that is widely adopted in cities across Canada to ensure the provision of affordable housing.

Recommendations for Draft 3:

- Use of Inclusionary Zoning as an overlay in all Hub areas (around major transit corridors and nodes).
- Maximize the provincial requirement for inclusionary zoning (inclusion of 5% of housing as affordable).
- Inclusion of family and accessible units as a portion of the 5% of affordable units.

Protection from Pollution

The on-site outdoor amenities and fresh air ventilation intakes must be protected from adjacent sources of air pollutants including traffic or idling vehicle areas such as drive-throughs, and loading zones, but not including parking spaces.

Protection from sources of air pollutants can be achieved through setbacks, vegetation, or other technologies that provide absorbent and protective buffering, or a combination of these measures. Sources of air pollutants are defined as areas within:

- 150 m of a road with an average of 50,000 vehicles or more per day,
- 100 metres of road with an average of 15,000 vehicles or more per day, and
- 100 metres of idling areas.

We recommend that an objective measure of air pollution (particulates) and a standard be established in consultation with Ottawa Public Health. Protection options include vegetative buffers, a physical buffer either by the building, or other structures such as walls 1.5 m high or 3.5+ m above road level.

Inequitable Tree Canopy Distribution and Heat Islands

POP is concerned that equity-deserving neighbourhoods will be the busiest, high traffic and most densely hardscaped areas, leaving less room for trees and increasing the heat island problem. The Urban Forest Management Plan commits to addressing the inequitable distribution of tree canopy in specific neighbourhoods as documented in the City and NCC's 2019 Tree Canopy Assessment. The City's goal of 40% canopy cover will not be reachable without equitably and strictly regulating soft landscaping and greenscaping in the zoning by-law. Additionally, mechanisms such as cash-in-lieu of parkland should be appropriately leveraged to ensure that priority neighbourhoods and rapidly intensifying neighbourhoods have equitable access to greenspace.

Recommendations:

- The by-law needs to have special provisions for increased soft landscaping in these neighbourhoods, including exceptions for larger front yard setbacks, larger soft landscaping minimums, and large permeable Right of Way spaces.
 - We recommend including a provision that using the Tree Equity Analysis as a tool, neighbourhoods deficient in greenspace must require 10% of the total lot area to be permeable.
- *Heat in the Street*: Similar to the City of Hamilton having a maximum heat by-law, zoning could support a new regulation that if a street block or corridor exceeds a temperature of 37 degrees celsius for significant periods (metrics to be devised), required de-paving or greenscaping must be undertaken.

Rural Transect

The definition of "shelter" should be expanded to include rural transect.

Maintenance of Pedestrian Access for Residential Buildings

Residents are left vulnerable during winter months where their main access to purchase food and/or other essential care items/services are inaccessible due to lack of maintenance of thoroughways by residential landlords, especially in the case of high-rise buildings with high density populations.

Recommendation:

- Require residential property owners of multi-dwellings (i.e. housing co-operatives, high rise buildings, etc) to maintain pedestrian access points throughout all seasons, including clearing and maintaining in winter months, when pathways connect to essential services including food provision.

Inclusion of Targets for Edible Landscapes

We are asking for a target to be set for edible trees (nut/sap/fruit/berry trees) within City tree planting as a means to integrate the benefits of increased community food security and biodiversity with stormwater retention, soil remediation, and climate change mitigation.