



File Number D02-02-20-0058

Dear Development Review Services – West

**Re: Planning Rationale Addendum – 231 and 251 Penfield Drive - File D02-02-20-0058**

In support of the City of Ottawa, Housing Services' Zoning By-law Amendment application resubmission relating to the file noted above, please accept this Planning Rationale Addendum as part of the resubmission package.

## 1.0 Introduction

The original application for Zoning By-law Amendment was submitted on July 15, 2020. It was circulated and staff provided consolidated comments to the applicant in a letter dated September 14, 2022. Shortly thereafter and due to suspected contamination of the site, the project was placed on hold and additional environmental investigation was undertaken to determine the full extent and nature of the contamination as well as the implications it may have from a development standpoint.

More recently it has been confirmed that the environmental considerations can be reasonably mitigated, and Housing Services is therefore proceeding with the Zoning By-law Amendment application. The development proposal which includes eight new single-storey townhouse units geared towards seniors, remains predominantly the same and only minor adjustments have been made to address staff comments.

This application has been submitted for the purpose of constructing non-profit affordable rental housing geared towards seniors, and as such, this application review should benefit from the High Social Impact Program.

This addendum addresses two main changes which are as follows:

1. **Implementation of the new Official Plan 2022** – Since this Zoning By-law Amendment was submitted, the City has adopted a new Official Plan. This addendum provides an updated analysis of conformity based on the new Official Plan policies.
2. **Revisions to the approach taken with the Zoning By-law Amendment** – Staff comments requested clarifications on both the proposed use and the parking requirements. This addendum addresses a change in how the proposed use is best defined, based on the definitions set out in the Zoning By-law, as well as the implications on parking rate within the proposal.

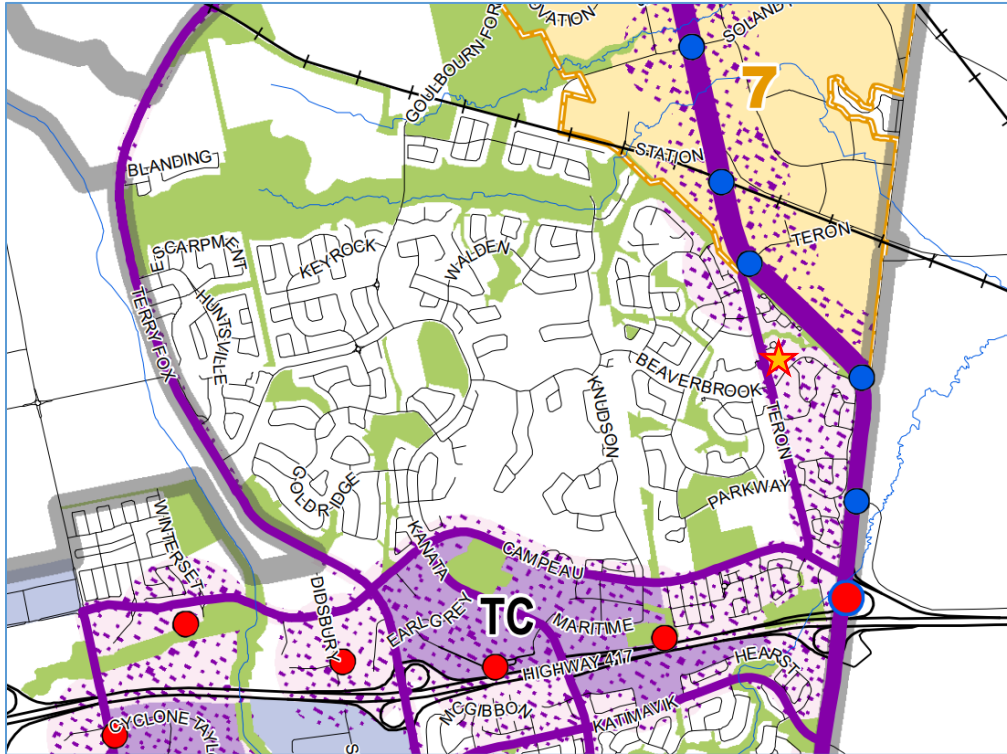
## 2.0 Conformity with the new Official Plan (2022)

The new Official Plan, adopted by By-law 2021-386, as amended, outlines a comprehensive land use policy framework to guide growth and development within the City to the year 2046, including policies and schedules that address, among other things, housing and growth management.

### 2.1 Designation

In accordance with Section 5 of the Official Plan, the subject site at 231 and 251 Penfield is located within the Suburban Transect. This transect comprises neighbourhoods within the urban boundary located outside the Greenbelt. Within the Suburban Transect, the subject site has a Neighbourhoods designation with an Evolving Neighbourhood Overlay. This designation is characterized by low-rise development which is predominantly ground oriented unless located near transit stations and corridors. Neighbourhoods located in the Suburban Transect shall accommodate residential growth to meet the Growth Management Strategy, as outlined in Subsection 3.2 of the Official Plan and as summarized below. The Evolving Neighbourhoods Overlay has been applied as the subject site is located within close proximity to a transit station where there is expected to be a gradual change of character in support of intensification goals.

**Image 1 – Excerpt from Official Plan Schedule B5: Suburban (West) Transect**



Section 5, Table 6 sets out the general characteristics of suburban built form and site design. It states that typical suburban developments have moderate front yard setbacks focused on soft landscaping, larger lots and lower lot coverages, a variety of building forms including single storey units, generous spacing between buildings and natural areas that often include grassed areas and private parking that may be prominent from the street.

Section 5.6.1 outlines the intent of the Evolving Neighbourhood Overlay. This overlay is applied to areas near hubs and corridors or in close proximity to high order transit. It provides built form direction where intensification is anticipated to occur. Where this overlay is applied the Zoning By-law shall provide development standards for the built form and buildable envelope consistent with the planned characteristics of the overlay area, which may differ from the existing characteristics of the area to which the overlay applies (Section 5.6.1(2)(a)).

Also within this overlay, Zoning By-law development standards and development on lands with an Evolving Neighbourhood Overlay should generally include built form and site design attributes that meet most of the urban characteristics described in Table 6 in Section 5, and where suburban attributes are retained, that these do not structurally impede the achievement of a fully urban site design over time (Section 5.6.1(6)).

**251 Penfield Drive is a long narrow City-owned parcel of land which, if developed in isolation, would have limited development potential. The City has conditionally approved the transfer of this parcel of land to Ottawa Community Housing Corporation, who own the adjacent parcel at 231 Penfield Drive where there is an existing 40-unit seniors residence. The proposed development is a one-storey block of eight ground-oriented townhouse units which will mainly be located on 251 Penfield Drive, with a portion of the proposed parking lot located on the adjacent parcel. The new development is characterized by a 7.5m front yard**

setback typical of the surrounding suburban context, lower lot coverage, ample greenspace and separation between buildings, and a surface parking lot adjacent to the dwelling units. This proposal will maintain much of the suburban neighbourhood character while increasing the density on site in a manner that is consistent with the character of the area.

As explained further below in Section 2.2, the proposed units will bring the density on site well within the intended range for development sites within the Neighbourhoods designation in the Suburban Transect. This is consistent with intended direction for intensification within areas with the Evolving Neighbourhood Overlay. Although the proposed development does not significantly move towards implementation of more urban site attributes, it also does not structurally impede the achievement of a fully urban site design over time. With the Townhouse units located only on a small portion of the amalgamated sites near the western property line, once the existing 40-unit building requires replacement, this site will be able to achieve further intensification without the proposed townhouses being a barrier.

## *2.2 Growth Management*

Section 3 sets out the growth management framework for the City. Ottawa is a large municipality with different geographies that will accommodate different amounts and types of growth. The urban area of the City is comprised of a built-up area where existing development is located, and a greenfield area of vacant lands at the periphery of the urban area. Most growth will occur within the urban area of the City. Section 3.2 Table 3b identifies the target density range of 40 to 60 dwellings per net hectare within the Neighbourhoods designation in the Suburban Transect.

**The amalgamated development site is 1.0085 hectares in area and is currently occupied by 40 dwelling units in a low-rise apartment building, translating to approximately 40 units per net hectare. The additional units proposed would bring the density up to approximately 48 units per net hectare, which is within the target range. This additional density is being achieved while maintaining the typical Suburban Transect characteristics, as noted above. The proposed development has been designed such that further intensification of the site may be achieved in the future once the existing 40-unit residential building is at the end of its life cycle.**

## *2.3 Urban Design*

Urban Design is the process of giving form and context to our City to create the theatre of public life. It concerns the design of both the built form and the public realm. Urban design plays an important role in supporting the City's objectives such as building healthy 15- minute neighbourhoods, growing the urban tree canopy and developing resilience to climate change. New development should be designed to make healthier, more environmentally sustainable living accessible for people of all ages, genders and social statuses.

The following urban design policies are particularly applicable to the subject site and proposed development:

4.6.5(3) Development shall minimize conflict between vehicles and pedestrians and improve the attractiveness of the public realm by internalizing all servicing, loading areas, mechanical equipment and utilities into the design of the building, and by accommodating space on the site for trees, where possible. Shared service areas, and accesses should be used to limit interruptions along sidewalks. Where underground parking is not viable, surface parking must be visually screened from the public realm.

4.6.5(4) Development shall demonstrate universal accessibility, in accordance with the City's Accessibility Design Standards. Designing universally accessible places ensures that the built environment addresses the needs of diverse users and provides a healthy, equitable and inclusive environment.

4.6.6 (6) Low-rise buildings shall be designed to respond to context, and transect area policies, and shall include areas for soft landscaping, main entrances at-grade, front porches or balconies, where appropriate. Buildings shall integrate architecturally to complement the surrounding context.

**The proposed single-storey, low-rise infill development of eight townhouse units provides accessible units geared towards seniors. The proposed development responds to the transect area policies as it relates to parking location and type, lot coverage and soft landscaping on site. The vehicular access proposed, while shifted slightly east, will provide no additional interruption along the Penfield sidewalk. The addition of the**

proposed building near the western property line will not impede further intensification on site in the future, once the existing 40-storey residential building reaches the end of its life cycle.

### 3.0 Zone Provisions and Analysis

This section addresses a City-initiated change to the existing R4X[1201] zone and provides information and analysis on a revised approach to the proposed use on site, and resulting zoning compliance considerations, including parking rate.

#### 3.1 City-Initiated Amendment to existing R4X[1201] Zone Provisions

Since the Zoning By-law Amendment application was submitted, a City-initiated zoning by-law was enacted (by-law 2020-209), which removed residential density limitations from the special exceptions of multiple properties throughout the City. The R4X[1201] zoning at 231 and 251 Penfield was one of the affected sites. Where previously the special exception provisions indicated that density could be no greater than what was existing, this has been removed from the zone provisions. The special exception now reads as follows:

**Table 1 – Current Exception 1201**

I Exception Number	II Applicable Zones	Exception Provisions		
		III Additional Land Uses Permitted	IV Land Uses Prohibited	V Provisions
1201 (By-law 2020-291)	R4X[1201]		- all uses except retirement home	- minimum lot area: 8,000 m <sup>2</sup> - minimum lot width: 30 m - minimum front yard setback: 7.5 m - minimum rear yard setback: 7.5 m - minimum interior side yard setback: 3 m provided that where the interior side lot line abuts an R1M zone, the minimum interior side yard setback is 4.5 m - minimum net floor area: dwelling unit 42 m <sup>2</sup> - maximum building heights: i) main building: 11 m ii) accessory buildings: 4 m

#### 3.2 Revised Approach to the Proposed Use

The original intent to maintain the parent R4X zoning for the subject site remains the same as presented in the original proposal. Where the current zoning exception shown in Table 1 limits the allowed uses on site to a retirement home, this amendment proposes to reinstate all permitted uses allowed through the R4X zone. This approach is consistent with the City of Ottawa’s intensification goals by permitting a much wider range of low-rise residential uses on site. Also described in the July 2020 Planning Rationale, the addition of the proposed eight-unit townhouse block to the site will make this site a Planned Unit Development and all applicable provisions of Section 131 will apply to the proposed development.

The primary change to the Zoning By-law Amendment compared to what was presented in the July 2020 Planning Rationale is the dwelling type for the new eight-unit residential building. Where previously the proposed use was categorized as a Retirement Home, further review and consideration for the dwelling type definitions indicates that the new building is more appropriately categorized as a Townhouse. While the new units are intended to be occupied by seniors, based on the definition set out in the Zoning By-law, the function of the Retirement Home use necessitates the inclusion of at least one rooming unit within the dwelling type make-up, which is not the intent with this project, which is intended for seniors in an independent living arrangement. There is also no intent to provide any ancillary services on site or supportive in-house care. It is therefore more appropriate to consider this building under the Townhouse definition.

Retirement Home is defined as follows:

**Retirement home** means a building or a part of a building containing rooming units or a combination of rooming and dwelling units, providing residence mostly to senior citizens who do not require assistance with daily living, and which may provide ancillary health, personal service, and recreational services to serve the residents of the home,

and may have up to 25 per cent of its gross floor area devoted to providing supervised or supportive in-house care for those who need assistance with daily living including on-going medical care, nursing care, counselling and social support services. (maison de retraite) (By-law 2016-131).

Townhouse is defined as follows:

**Dwelling** includes: (habitation)... (k) **Townhouse Dwelling** means a residential use building containing three or more attached principal dwelling units divided vertically. (une habitation en rangée) (By-law 2012-334).

Ottawa Community Housing Corporation, who will own and operate the new building, have a seniors-focused mandate for this site, both within the existing 40-unit residential use building and for the new units, once constructed. In this way, the proposed residential building will function similarly to a retirement home, minus the inclusion of rooming units within the unit composition.

Although outside of the scope of this proposal, it is also useful to note that within the existing 40-unit, senior's focused residential building at 231 Penfield, there are no rooming units or ancillary services and there is no supportive in-house care. As such, this building is more accurately defined as a low-rise apartment building geared towards seniors as opposed to a retirement home, as it currently appears to be under the existing zoning.

### 3.3 Parking Requirements

Under the original proposal, the proposed eight-unit residential building was considered a Retirement Home within a Planned Unit Development. The minimum resident parking rate associated with this use is 0.25 spaces per unit.

Within this revised approach, the proposed building is defined as a Townhouse within a Planned Unit Development. The minimum resident parking rate associated with this use is 1.0 spaces per unit.

Within both the original and revised approach, the minimum visitor parking space rate is 0.2 spaces per dwelling unit.

The number of new parking spaces proposed on site remains the same at 14 (including two barrier-free spaces). Based on the above-noted rates for a Townhouse use, eight resident spaces are required, and two visitor spaces are required to support the proposed development. When reviewing parking compliance for the proposed building in isolation from the existing building and parking spaces on site, the proposal exceeds the minimum parking requirement by two parking spaces.

The existing 40-unit residential building is formally supported by 10 parking spaces, which equates to a rate of 0.25 spaces per dwelling unit resident parking. No visitor parking is provided on site. In addition, the existing surface parking lot at 251 Penfield has likely been providing informal parking opportunities for the surrounding uses, including the existing residential building at 231 Penfield.

Once the new residential building is constructed, the intent is for residents of both buildings to share all parking spaces, as is permitted in a Planned Unit Development. Table X and Y below identify the parking counts for the existing building, the new building, and combined.

**Table 2 - Existing and Proposed Parking Rates**

	Existing Building (40 units) and Existing Parking Spaces	Proposed Building (8 units) and Proposed Parking Spaces
Resident Parking		1.5/unit (12 spaces)
Visitor Parking		0.2/unit (2 spaces)
Total Parking	0.25/unit (10 spaces)	1.7/unit (14 spaces)

**Table 3 - Combined Parking Rate**

	Proposed Minimum Parking Rate for all 48 Units	Proposed Parking on Site for all 48 Units (per concept plan)

Resident Parking	0.25/unit (12 Spaces)	14 Spaces
Visitor Parking	0.2/unit (10 Spaces)	10 Spaces
Total Parking	0.45/unit (22 Spaces)	24 Spaces

The applicant is proposing a combined parking rate approach, where the resident parking rate is set at 0.25 spaces per unit for all 48 dwelling units across the site. This rate is consistent with the minimum resident parking space rate for the Retirement Home use. Since all units on site are intended for seniors, the site will function almost exactly as a Retirement Home use would, other than the omission of any dwelling units within the unit mix. Therefore this revised zoning approach proposes that a resident parking rate that is consistent with the rate for a Retirement Home use is appropriate in this context.

### 3.4 Proposed Zoning

**Table 4 – Compliance with Existing R4X[1201]**

Zoning Mechanism	Requirement per Parent Zone or Exception	Requirement	Proposed	Conformity
Permitted Use	Exception	Retirement Home	Planned Unit Development, Townhouse	✗
Minimum Lot Area	Exception	8,000 m <sup>2</sup>	10,266 m <sup>2</sup>	✓
Minimum Lot Width	Exception	30 m	133.1 m	✓
Minimum Front Yard Setback	Exception	7.5 m	7.5 m	✓
Minimum Corner Side Yard Setback	Parent	7.5 m	N/A	✓
Minimum Interior Side Yard Setback	Exception	4.5m adjacent to R1M zone; 3m in all other cases	4.5m adjacent to R1M zone; 3m in all other cases	✓
Minimum Rear Yard Setback	Exception	7.5 m	>7.5 m	✓
Maximum Building Height	Exception	11 m	7.4 m	✓
Maximum Building Height – accessory building	Exception	4 m	<4 m	✓
Minimum Net Floor Area	Exception	42m <sup>2</sup> per dwelling unit	52 m <sup>2</sup> per dwelling unit	✓
Minimum Residential Parking Space Requirement	Parent	1 per dwelling unit	0.25 per dwelling unit	✗
Minimum Visitor Parking Space Requirement	Parent	0.2 per dwelling unit	0.2 per dwelling unit	✓

In addition to the above, the proposed development has been reviewed in accordance with the Planned Unit Development provisions in Section 131.

This proposed Zoning By-law Amendment requests removal of the following existing special exception provisions and returning these provisions to the parent R4X zone provisions:

- Remove all prohibited land uses
- Remove minimum net floor area requirement
- Remove maximum building height and accessory building height

This proposed Zoning By-law Amendment also requests the following additional zoning mechanism be added to the new special exception:

- One lot for zoning purposes

## 4.0 Conclusion

Taking into consideration the new policy environment with the implementation of the new Official Plan 2022 and the amended approach regarding the proposed use for the new building, it remains our professional opinion that the proposed Zoning By-law Amendment application is appropriate, represents good planning and is in the public interest.

Sincerely,



Mary Dickinson, MCIP, RPP  
Community and Social Services Department  
Housing Services

cc: Ottawa Community Housing Corporation  
Atelier 292 Architect Inc.