



**February 7, 2025**

**To: The National Capital Commission**

**Attention: Alain Miguelez, Vice-President, Capital Planning and Chief Planner**

Via email: [alain.miguelez@ncc-ccn.ca](mailto:alain.miguelez@ncc-ccn.ca), [consultations@ncc-ccn.ca](mailto:consultations@ncc-ccn.ca)

**Subject: Preliminary comments by the New Edinburgh Community Alliance (NECA) on the National Capital Commission's update to the National Capital Core Area Plan with respect to a conceptual proposal for Sussex Blocks, a mixed-use development in New Edinburgh**

The New Edinburgh Community Alliance (NECA) is providing preliminary comments regarding the conceptual proposal for Sussex Blocks by the National Capital Commission (NCC) in its update to the National Capital Core Area Plan. The Sussex Blocks proposal is for a mid-rise, mixed-use development on the three blocks bounded by Stanley Avenue, Thomas Street, MacKay Street and Sussex Drive.

NECA's preliminary comments will cover the following topics:

- A. Introduction**
- B. Consultation process**
- C. Heritage**
- D. Parking and traffic congestion**
- E. Trees and parkland**
- F. Urbanism and the Core Area Plan**
- G. Construction**
- H. Flood plain and insurance**
- I. Providing food and drink and other amenities**
- J. Pathway system**
- K. Burying hydro lines**
- L. Animating the Rideau River**
- M. Reconciliation with Indigenous Peoples**

## A. Introduction

The NECA bylaws state that New Edinburgh, in the City of Ottawa, encompasses the area bounded by the Ottawa River, Princess Avenue, Lisgar Road, Maple Lane, Springfield Road, Beechwood Avenue and the Rideau River. Part of New Edinburgh, the area between Dufferin Avenue and Sussex Drive, is a Heritage Conservation District (HCD). The entire HCD is part of the NCC's core area, such that New Edinburgh has been affected directly by past decisions of the NCC. NECA's preliminary comments here are part of a continuing productive dialogue between our community and the NCC.

There may be references in these comments to that history between NECA and the NCC. If we misrepresent any of that history, we apologize. The intent is to be focussed on the current proposed plan, but to do so with an awareness of the history of NCC involvement with New Edinburgh's community, and to keep attention on some current issues where we need the NCC's involvement and cooperation.



**Figure 1** – Sussex Blocks is proposed for the three blocks in the shaded area marked 2.

## B. Consultation process

The proposal for the Sussex Blocks was first mentioned and described by Alain Miguez, of the NCC, to the board of NECA and members of the public who were attending the NECA Board meeting on January 21, 2025. Two days later, the NCC released the update to the Core Area Plan at a public, in-person meeting and subsequently posted a Story Map (presentation) and other materials on the NCC website. The NCC invited the public to provide feedback on the plan via an online survey that will be open until February 5, 2025.

As a result of the NECA meeting on January 21, the co-editor of the *New Edinburgh News* ensured that the newspaper (which was then in production for the February issue) would include a short article on

the update to the Core Area Plan to bring it to the community's attention. With an expected release of the printed newspaper in early February, and home-delivery of the paper during early February, it is likely many readers may miss the online survey deadline of Feb. 5.

A two-week online survey is an extremely short window for any community to become aware of specific proposals and then to develop informed responses and provide feedback.

As we discussed with NCC representatives following their presentation at the NECA board meeting on January 21, 2025, there needs to be further consultations with the entire community. NCC staff indicated they would indeed be doing that as the proposal proceeds. We noted that one vehicle for engaging our community would be through articles in the *New Edinburgh News*, a community newspaper which we publish five times a year and deliver to the New Edinburgh community.

NECA requests the NCC hosts a dialogue in the community for residents to learn more about the proposal, to ask questions and share their feedback. NECA is open to facilitating such a public meeting with the NCC within the community.

Given that the NCC will have control over the choice of architect and all planning aspects of its proposed development, extensive and in-depth engagement in person and virtually with the community is vital to ensuring the NCC learns and incorporates all the feedback, knowledge and experience of residents and that it aligns with what makes New Edinburgh a highly livable and appealing neighbourhood.

The first and most critical step is to enhance the consultation process (as noted above) and engage the largest number of citizens in our community who may be keen to provide their views on the proposal.

### C. Heritage

As noted earlier, the proposed development would be located within the New Edinburgh HCD. To that end, we would expect that the NCC would respect the policies and guidance in the [New Edinburgh Heritage Conservation District Plan](#). The Plan will aid in an approach to, in the NCC's words, "an architectural style faithful to New Edinburgh's historic neighbourhood character."

There is an important heritage structure, the Fraser Schoolhouse, on John Street in the proposed development blocks. It needs to be retained. Also, a stone wall at Sussex and Alexander should be retained.

Additionally, there are four residential properties on one of the blocks affected by the proposed development. As the owner and landlord of those properties, the NCC must take care to communicate and manage the issues that will arise for those tenants and the future of those properties and respect any heritage designations.

Many of the original structures in the three-block area were torn down by the NCC when it acquired the land in the 1950s and 1960s. In the late 1960s, the concepts that motivated the original decision were challenged by the "Jane Jacobs" view of what constitutes a desirable urban environment. Many members of our community support the Jane Jacobs vision, although how to do so is no easy matter.

Developing the three-block area for mixed-use, with amenities for people to meet and socialize, may be consistent with the Jane Jacobs vision. By the way, we already have a great café at 42 Crichton Street, and NECA honoured the proprietor of that café with a Community Builder award in 2023.

#### **D. Parking and traffic congestion**

The parking issue needs to be addressed in the context of this development proposal. Several of the key elements underpinning this proposal are geared towards adding attractions such as retail opportunities, gathering spaces and greater accessibility to the Ottawa River. The goal is to create a series of appealing 'destination' nodes which will 'activate' the area.

We note that the housing development provides for underground parking. That assumes that on-street parking on Stanley, John, Alexander, MacKay and Thomas will continue to be regulated by the City, and that the NCC has no plans to add parking on Sussex. There are several parking spaces north of Sussex on the continuation of John Street.

One question is how many more visitors would be generated by these offerings and how will they be getting there? Some people will walk or cycle or take public transportation, but many will want to drive their cars and they will be looking for parking spaces.

During the week, there is limited capacity on New Edinburgh's streets as employees from Global Affairs Canada park bumper to bumper on all the streets where parking is permitted between Sussex and Dufferin and MacKay and Stanley Avenue. On weekends, if there is a special event at Rideau Hall, the streets of New Edinburgh are used for parking. The Councillor for this ward has done a parking survey, which found that there is concern about parking in New Edinburgh, and is trying to develop a proposal to address these concerns.

Additionally, there are much higher traffic flows along Confederation Boulevard (Sussex Drive), the parkway and into the neighbourhood during peak hours on Monday through Friday, which may well be further exacerbated without proper planning.

#### **E. Trees and parkland**

Much of the three-block area proposed for Sussex Blocks has been parkland for over 60 years. There are numerous mature trees on the lands (see figure 2, below).

"Sustainability and resilience" is one of the key themes of the Core Area Plan. Trees and parkland are integral elements to realize sustainability and resilience at the community level, especially in light of the impact of climate change and the increased frequency of extreme weather events.



**Figure 2:** Aerial view of the three-block area which features many mature trees.

NECA requests the NCC take the appropriate steps to ensure the retention of the mature trees located on the three blocks.

The City requires new developments to dedicate parkland or pay cash-in-lieu. Although the NCC is a federal agency, and perhaps not legally obliged to meet City requirements, we hope that the NCC will consider contributing to community greenspace or to the costs to acquire and/or maintain it.

A great urban greenspace is our own park in New Edinburgh, part of which is in the Core Area, and part outside. The Crichton Community Council (CCC), whose leadership is represented on the NECA Board, provides programming at the New Edinburgh Park Fieldhouse, and the community enjoys coming together there.

New Edinburgh Park and Stanley Park are beside the Rideau River, with the Peace Tower in the distance. We have worked hard with the City to ensure that there are traffic calming measures in place on the adjacent section of Stanley Avenue. Volunteers with NECA work hard to ensure that any problems in the park are addressed promptly. For example, signage in the park to keep people safe is occasionally taken down, but we work with the City to replace it promptly.

The NCC, which removed the train tracks and factories on the site long ago, has worked to address concerns about contaminated soil.

#### **F. Urbanism and the Core Area Plan**

Many of the original structures in the three block area (a significant portion of which was housing) were torn down by the NCC when it acquired the land, in the 1950s/60s. Alain Miguelez stated that the NCC had previously zoned the three-block area for embassies, but that the RCMP had recommended against this for security reasons.

From our perspective, in the late 1960s, the concepts that motivated the original decision were challenged by the “Jane Jacobs” view of what constitutes a desirable urban environment. When, in the 1970s, the City proposed to build a parkway through the other end of our community, we successfully fought that proposal. The section of Sussex Drive from the Mint to the traffic circle in front of the

Governor-General's grounds currently does not feel very active. We welcome the opportunity to comment on plans to make it more active.

You indicated that, in addition to housing, there would be underground parking, and amenities for people to meet and socialize. Can you tell us the number of units the proposal might be calling for? What size would the units be? Would there be a reasonable number of 3- and 4-bedroom units, as there is in the rest of New Edinburgh? The general height for the proposal appeared to be four storeys. Do you plan to stay within a 35-foot height limit, except for the tower feature at Stanley and Sussex? How high do you imagine that to be?

Another key element of urbanism is the importance of government agencies working with others, notably volunteers with specialized interests who can help you achieve your mandate. Community groups like us are one example, but cycling clubs, sports clubs, community garden organizers, business associations, festival organizers and so on, are other examples. We encourage you to highlight this in your plan, and in your work on the Core Area.

The NCC's proposed plan talks about turning "toward the water and shorelines." We hope it will make clear that this "turn" is not limited to the Ottawa River, but specifically includes the section of the Rideau River in the core area. While we encourage initiatives that would further activate the community's enjoyment of this stretch of the Rideau River, we also would emphasize the importance of the shoreline restoration efforts of the RVCA and the need for this work to continue in light of climate change impacts.

To add to the plan's themes of "pageantry and ceremony" as well as "diversity and representation", the NCC could consider putting up neighbourhood banners on the streets coming off of Confederation Boulevard. This would further add to the concept of "capital streetscapes" and create more pleasing urban environments.

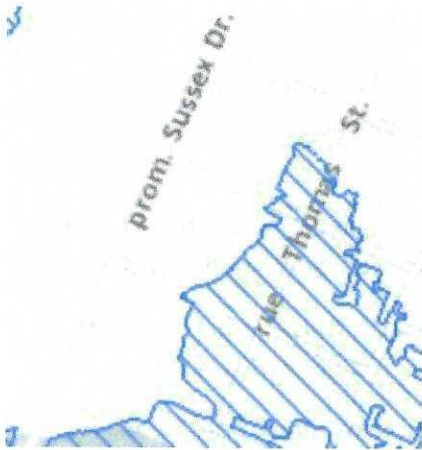
#### **G. Construction concerns**

The homes on Thomas Street currently overlook park space with a view toward the Gatineau Hills. So, they will have a very different view. Additionally, the community would not like to see construction drag out over multiple years, devaluing our properties and diminishing our enjoyment of our homes because of noise and dirt from construction. Recent studies on housing costs argue that breaking up big projects into little pieces increases costs, at a time when housing is increasingly unaffordable to many Canadians. For those two reasons, we ask the NCC to treat the entire proposal for the three blocks as a single project, to be constructed all at the same time. Of course, construction should be done in a way that minimizes dirt and noise, and is sensitive to the neighbouring community.

Please note that it has only been a few years since the completion of the enormously disruptive Combined Sewage Storage Tunnel (CSST) project in New Edinburgh – with daily truck traffic, construction, high noise levels and other health-impacting activity.

## H. Flood plain and insurance

Part of the HCD area is considered a flood plain by the Rideau Valley Conservation Authority (RVCA). This affects construction and renovation projects, as well as home insurance cost and availability. Historically flooding was caused by ice dams, a problem now managed by the City by breaking up the ice before spring breakup.



**Figure 3** – Flood plain mapping covers part of the three blocks proposed for the Sussex Blocks development. (Source: City of Ottawa)

While the NCC may be able to get an exemption for its project, from our perspective we would like this issue to be laid to rest so that insurance becomes available, and so construction in the community can proceed without need for special structures to deal with a flooding issue that will be addressed by other means.

In this connection, we recall that, a number of years ago, there was a proposal, supported by NECA, to build a 30 cm high berm in low lying areas along the river, in the New Edinburgh area, to significantly mitigate the risk of flooding. Much of the area where the berm is needed is on NCC land. NECA consulted with the NCC, the City and the RVCA about this. There seemed to be general agreement that a berm would be useful in addressing potential flooding. However, the creation of a berm was not part of the CSST restoration plan by the City.

The issue of the design of the berm was also raised during the consultations mentioned above, with the suggestion from one agency that an engineering study would be needed. Since the proposal only involves raising the land by 30 cm or so, this should be possible to do without an engineering study. The only technical requirement would be the surveying work needed to ensure the appropriate height of the berm. (We will comment on this issue further in our comments on the proposed expansion of the pathway system).

Thus, an action for the NCC to take, as part of the proposed development, or even earlier, is to build the proposed berm. This would also, from our perspective, be consistent with the obligation on developers to contribute funding for greenspace.

#### **I. Providing Food and Drink and Other Amenities**

The provision of food and drink and other amenities to tourists is easier said than done. Tourist traffic is seasonal, whereas many of the costs of an amenity space continue year round. You have experienced the difficulty of having to manage vacant retail space along Sussex in the ByWard Market area, so we are not telling you something you do not already know.

We support the idea of 15 minute neighbourhoods, but the main focus of retail for New Edinburgh is Beechwood Avenue, a main street area we share with Rockcliffe Park, Lindenlea, Vanier, and Manor Park, and which consequently can support a wide range of amenities.

The Tavern on the Falls is just across Sussex from the proposed development and seems to be working well. Does the NCC find it is too far from the Governor-General's grounds to service the tourist traffic?

Another option, which the City has been using in some areas, is food trucks. This approach minimizes the need for year-round facilities, but is not appropriate for daily use in front of people's homes.

Additionally, we note the description of the development of the blocks is to "support the Rideau Hall tourist anchor" and wonder why support in the way of food and drink and other amenities might not continue or be expanded on-site at Rideau Hall grounds as it has in the past.

#### **J. Pathway system**

One aspect of the draft Core Plan is improving and extending/completing the pathway system. The multi-use pathway is well-used, so in that respect it is a great success, and we welcome it. Through much of New Edinburgh, there is a separate, unpaved lane for use by pedestrians only. For our seniors, or anyone who walks on the pathway with young children, we do not think the sections of the path that do not have a separate path for pedestrians are safe.

This issue is exacerbated by heavy electric bikes and scooters which increasingly use the multi-use pathway. The NCC told us that the plan proposes expanding the pathway system. We would ask that, in our area, the plan should also provide for upgrading sections that do not have a dedicated pedestrian lane. And, of course, you should plan to keep thinking about how to deal with the issue of electric bikes and scooters.

Returning to the berm issue: Since the multi-use pathway runs near the river, it may be possible to build much of the proposed berm simply by having the third, pedestrian-only lane of the pathway slightly higher than the surrounding land. That would be attractive and useful for recreation and flood protection at the same time.

#### **K. Burying hydro lines**



Another issue we would like to see addressed is burial of the hydro lines in the HCD, and of course in the proposed development. The hydro line along MacKay Street is one of several lines providing electrical service to the PM's residence, but the result of the MacKay Street line is the need for severe pruning of trees, thus seriously damaging the tree canopy along that street. These are potentially beautiful trees that are growing on the vice-regal grounds.

Burying the line, thus allowing a proper tree canopy to grow along MacKay Street would not only enhance the Governor-General's grounds, but also enhance the beauty of MacKay Street, and potentially even calm traffic.

Protecting the tree canopy throughout the HCD will enhance its heritage look, contribute to community green space, calm traffic, and bring its hydro infrastructure up to the standard the City requires in all new developments. Again, doing so in conjunction with the proposed development should, in our view, be considered as a contribution by the development to the greenspace in our community.

#### **L. Animating the Rideau River**

Part of the attraction of the proposed development is that it would be on the Rideau River, which is not only beautiful, but offers opportunities for river recreation such as kayaking. There are places in the Core Area to launch a kayak, but there are almost no kayakers on the Rideau River. Apparently, kayakers much prefer to kayak on the Ottawa River.

We suggest that if you are going to promote the Rideau River for recreation in the core area the NCC (and the City) need to address any issues that may be impeding its recreational use. This is something you may wish to identify in a general way in your plan. It could also be a potential attraction for tourists visiting Ottawa.

Additionally, there is a problem with the Diefenbaker Building launch site: there is not usually any available parking nearby, making the site hard to use. Bordeleau Park has a launch site built by the City, but it does not seem to get a lot of use.

The NCC could create designated portage routes around the Rideau Falls. There could be an Indigenous heritage trail, as already created by the Kichi Sibi Trails, perhaps with some better landscaping and additional signage. There could also be a modern trail, using the new docks and such that they plan on building. Signage may help people to use the river.

#### **M. Reconciliation with Indigenous Peoples**

We note that the core area plan aims to find opportunities for contributing to reconciliation with the Indigenous people who have never ceded the territory we have been discussing.

Let us tell you about NECA's initiatives in this respect, one of which needs the NCC's cooperation to be fully implemented.

The Kichi Sibi portage trail is a re-creation of the historic portage route, used by the Algonquin, connecting the Ottawa River to the Rideau River. It runs over NCC lands in the core area for part of its length, then through New Edinburgh, and terminates at the Rideau River beside the New

Edinburgh Park Fieldhouse, which is located at the edge of the core area. We have installed a significant work of indigenous art on the exterior wall of the fieldhouse, and, the past two years, we have held a celebration honouring Indigenous ways, at the fieldhouse on July 1, which is also the completion point of what has become an annual paddle along traditional Indigenous routes.

NECA is hoping to forward with a proposal to the City to rename New Edinburgh Park, and would very much like to explore the possibility of having a single name for parkland that stretches from Beechwood to Sussex along the Rideau River that would reflect the indigenous heritage of our area. We would welcome the NCC to join us and the City in this project so that the entire park (most of it in the core area) could have a single name, one that honours the indigenous contribution to our area.

**Please identify a point of contact** so we can brief them on where this issue stands.

Since the Sussex Blocks proposal affects not only us but also is of interest to our MP, our MPP and our City Councillor, we are copying them on these comments.

We look forward to making plans with you to ensure a **whole-of-community, in-depth consultation on this proposal by the NCC with NECA's assistance** at the most appropriate time before the finalization of the updated Core Area Plan.

Sincerely,



Ray Boomgaardt

President

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cc.

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