

## Security and Parkland Analysis and Commentary on Embassy Row

Concerned Kitchissippi resident, Vivian Walsworth (formerly Chief Architect for the Department of National Defense and the House of Commons) authors the following analysis of the National Capital Commission's proposed embassy precinct near the Sir John A. McDonald Parkway and Slidell Street at Mechanicsville.

The documentation Mr. Walsworth reviewed includes 1) NCC planning documents obtained from the NCC's website and 2) NCC documents submitted to the City of Ottawa in support of rezoning and official plan amendments, available at [this link](#).

### 1) Potential Deficiencies in Planning Arguments

The major deficiency inherent in the planning analysis is the complete lack of any "Security Threat and Risk Assessment/ Analysis." In these times of ever escalating asymmetric and terrorist threats, foreign missions/ embassies located in liberal democratic countries like Canada are now, and will almost certainly in future, represent very obvious "soft targets" [defined as a person or thing whose level of protection is low, thus making them vulnerable to military or terrorist attacks].

The NCC planning premise for creating this "embassy precinct" is predicated on reinforcing the "Capital role". The Capital role, if a bit nebulous, seems in this instance to derive from symbolism evoked by the visibility of foreign embassies/ missions along the Ottawa River Parkway. Unfortunately, the symbolism that creates high visibility in support of the "Capital role" also brings with it high visibility as a "soft target". This is particularly worrisome considering the type of high-rise structures planned for the residential neighbourhood (buildings vulnerable to progressive collapse) and location in a zone planned for high human density. In short, the embassy precinct plan poses an unacceptably high level of security risk to residents.

Description of risk	Analysis/recommendation for mitigation of risk
Situating "embassies/ missions" in close proximity to high density residential land use, as proposed in the NCC's documents, creates considerable potential risk of collateral damage to the current and future residential unit occupants. This can only be exacerbated as a result of residential intensification on the scale currently proposed for Mechanicsville neighbourhood.	In planning of "capital" cities, embassy precincts" would preferably be isolated or buffered from intensive residential land use.

<p>Flat slab concrete construction typical of high-rise residential buildings can be particularly prone to progressive collapse in the event of relatively small street level blasts as might characterize the attack mode upon foreign embassies/missions. Mass casualties resulting from progressive collapse would fit well into the goals of hostile entities wanting "to send a message" to foreign governments located on Canadian soil.</p>	<p>NCC/federal government should endeavour to select embassy sites that obviate or mitigate collateral risks, rather than creating and/or exacerbating risks as is the case with the proposed embassy precinct at the riverfront location next to a dense residential neighbourhood.</p>
<p>The site being proposed by the NCC for embassies/missions is highly vulnerable in terms of physical, acoustic and electronic surveillance deriving from "overlook" by hundreds, if not thousands, of residential units immediately proximate to the proposed embassy sites.</p>	<p>Robust risk analysis undertaken by many foreign governments would likely disqualify the proposed site from serious consideration for their embassies/missions.</p> <p>Purpose-designed embassies in any kind of enclave are typically neither community friendly nor open-space oriented. More often than not, they are hardened, walled, fenced, gated installations with barren highly monitored perimeter security exclusion zones.</p>
<p>The proponent depicts the embassy precinct development as a series of pavilions set in a landscaped park.</p>	<p>Any form of landscaping must be minimal due to security considerations including the integrity of sight lines.</p> <p>Inclusion of landscaping of a scale to achieve any form of vegetative buffering as described in the NCC's Riverfront Park Plan within the proposed embassy precinct lands may be completely impractical.</p>

**2) Lack of Coordination with NCC's own Riverfront Park Planning Objectives**

The "Ottawa River South Shorefront Park Plan" issued June 21, 2018 and the currently applicable "Capital Urban Lands Plan" prepared by the NCC are referenced in the Planning Proposal submitted to the City of Ottawa by the NCC.

Site specific and general planning provisions embodied in both these approved NCC Plans are highly relevant in the context of the re-zoning proposal for Embassy Row and must be reconciled if the NCC is to maintain credibility as a planning organization, as relates to federal land use in the national capital region.

Description of disconnect	Analysis
<p>Based on available documentation, it is fair to conclude the NCC engaged in exhaustive public consultation and substantially met transparency obligations with respect to the lands constituted within the “Ottawa River South Shore Riverfront Park Plan” (the Riverfront Park Plan), as approved in June 2018.</p> <p>All the lands delineated within the Riverfront Park Plan appear to have been subject of public interest consultation, intensive planning analysis and are categorized environmentally based on well rationalized criteria.</p>	<p>The NCC site where an embassy precinct is proposed is designated as “NCC land.” It was not and is not an integral part of or within the boundaries of the NCC Riverfront Park Plan and/ or part of the process resulting in that Plan.</p> <p>Transparency in relation to planning decisions and contextual impacts of the proposed embassy precinct appear to have been largely obscured or ignored.</p>
<p>Some aspects of the proposed embassy development on the "NCC land" are in fact neither coordinated nor consistent with the provisions embodied in the Riverfront Park Plan. In particular, the Riverfront Park Plan delineates enhancements to both the “Landscape Buffer Background” and the "Landscape Foreground Buffer” to be located “on” the subject embassy sites.</p>	<p><b>The Background Buffer</b>, designed “to diminish the visual impact of adjacent buildings” is not adequately accommodated at the scale required to provide any effective buffer in the land use proposal. Inclusion of an effective vegetative buffer would supplant much if not all of the surface parking and negate requisite risk mitigation site security provisions along the south perimeter of the embassy sites.</p> <p><b>The Landscape Foreground Buffer</b> proposed in the Riverfront Park Plan along the north boundary of the embassy sites would probably be deemed incompatible with the physical security and sight line requirements typical of embassy sites.</p>

<p>NCC documentation of the initial community consultation phase relative to the Riverfront Park Plan specifically identified the easterly part (25%+ of the land area subject of re-zoning) as open landscape space linking to, and aligned with, Laroche Park to accentuate the community/ Parkland connection designated as a “secondary corridor” in the re-zoning proposal. The delineation indicated on the NCC drawings shared with the community is aligned with an extension of Stonehurst Avenue on the west side of Laroche Park.</p>	<p>The area of site allocated to the community/ Parkland connection called for in the Riverfront Park Plan has been whittled down by the embassy proposal to approximately 1/3 of the size as originally proposed (per 2014 consultation record and subsequent site schematics). This reduction in green space and/ or compromise to community/ parkland connection has not been rationalized in the proposal. <u>Importantly, the change has not been coordinated with the community.</u></p>
<p>In effect, the NCC’s planning proposal for the site would result in (embassy) buildings being constructed closer to the Riverfront Parkland than at any other location along the entire Parkway. This would undermine the established pattern of building/ landscape interface on an important segment of a crucial NCC roadway in the national capital, with no effective separation between the Riverfront Parkland/ Parkway and the built-up area.</p>	

### 3) Negative Impacts of the NCC proposal on the Riverfront Park/ Parkway

The NCC’s Planning Analysis for the embassy precinct as submitted to the City of Ottawa does not mention or elaborate on negative impacts related to the NCC Riverfront Park/ Parkway. Given the sensitivity to context evident in the 2018 NCC Riverfront Park Plan, it is incumbent on the NCC to address, if it can, the impending impacts of residential intensification on the NCC lands it wants to set aside as an embassy precinct.

The re-purposing of this currently open green space to accommodate embassy land use results in a massive diminution in the width of the landscaped open space on the south side of the Parkway. The reduction is between 300% and 500% along 1200 ft/ 365m segment of the land in question. In fact, the repurposing of open space for embassies/missions effectively eliminates an existing vegetative buffer the NCC intended “to diminish the visual impact of adjacent buildings” at this location (as per the Riverfront Park Plan). This undermines strategies established through the Riverfront Park Plan, a situation that will only get worse as intensification ramps up in Mechanicsville and the nearby Tunney’s Pasture complex.

<b>What the Riverfront Park Plan intends</b>	<b>Negative impacts</b>
<p>As alluded to in the NCC Riverfront Park Plan, building massing associated with both Bayview and Tunney’s LRT stations intensification zones will result in major alterations to the view planes impacting at least (1.6km diameter x 2) 3.2 km of the sky-scape immediately south of the NCC Shorefront Park/ Parkway in this location.</p>	<p>The experience of users of the Parklands/ Parkway will be strongly impacted by the scale of residential intensification planned for this area (a “wall” of tall buildings). This cannot be mitigated to any meaningful degree by the proposed vegetative buffer at the proposed embassy site, especially when clearing for security exclusion zones is also put in place.</p> <p>The only planning strategy that could effectively mitigate the view-plane, massing and sky-scape effects of intensification on the Parklands/ Parkway in this area is a massive enhancement of the vegetative buffer on the NCC lands in question, not elimination of the vegetative buffer as proposed by the embassy precinct proposal.</p> <p>Elimination of the vegetative buffer will fundamentally alter the character and sensibility of the river experience along this stretch of the Riverfront Park/ Parkway.</p>

**4) General Considerations**

<b>Description</b>	<b>Analysis</b>
<p>The lands in question are legally designated "Federal Crown Real Property" so the Constitution Acts establish legal precedence such that land use and development thereon are “not” subject to applicability of Provincial Statutes, Municipal By-laws etc. In essence, the Provincial Planning Act and the City’s Official Plan provisions deriving therefrom do not have any “legally”</p>	<p>The City of Ottawa Planning Office has no jurisdictional authority over development of these Crown Lands.</p> <p>On the other hand, the NCC, like other Federal Departments and Agencies, typically engages with other levels of government with respect to such endeavours “as a courtesy” rather than as a legal requirement. As well, constructive</p>

<p>prescribed application on Federal Crown Land.</p>	<p>collaboration with other levels of government "on Capital planning matters" is an inherent part of the NCC mission statement and policy framework.</p>
<p>It must be observed that Federal Crown lands are held in the name of Her Majesty "on behalf of the people of Canada". The NCC only has the custodial, stewardship and managerial responsibility for these lands.</p>	<p>NCC plans for future use of these Crown lands and the rationale for proposed land use should, as a matter of policy, be transparent and publicly disseminated.</p>
<p>Like every other Federal Department or Agency, the NCC is subject to Federal Real Property policy obligating the Corporation to acquire/ retain maintain, improve and operate lands to support "mission-related" and/ or "operational" requirements. However, there doesn't appear to be a specific mandate for the NCC to retain or bank land for "possible" future use to accommodate the development of foreign embassies.</p>	<p>The "Capital role" as alluded to in order to justify this particular planning initiative is probably justifiable in the context of lands abutting the Confederation Boulevard but it seems a bit of a stretch for lands abutting a Parkway. It is unclear why the NCC is mandated to hold/ re-zone land at considerable taxpayer expense for some foreign governments whereas other governments simply acquire land for embassy development in the private marketplace.</p>