



1330 Carling Avenue and 815 Archibald Street

Planning Rationale and Design Brief
Zoning By-law Amendment
May 13, 2020



Prepared for 1343678 Ontario Ltd.

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1.0 Introduction

Fotenn has been retained by 1343678 Ontario Ltd. (the 'Owner') to assess the appropriateness of a proposed redevelopment of their lands known municipally as 1330 Carling Avenue and 815 Archibald Street ('subject property') in the Carlington neighbourhood of the City of Ottawa. Specifically, Fotenn was asked to consider the most appropriate use for the subject lands, which are currently occupied by an auto sales operation with an accessory surface parking lot. Based on the findings of our assessment, Fotenn has prepared the following Planning Rationale in support of Zoning By-law Amendment and Site Plan Control applications to permit the proposed development.

1.1 Purpose of the Applications

The section of Carling Avenue in the vicinity of the subject property is evolving rapidly from its existing, primarily low-rise context into a high-density, mixed use corridor. This transformation is facilitated by the Arterial Mainstreet designation along Carling Avenue, the planned at-grade transit improvements along Carling, and the recently approved Westgate Secondary Plan. In recent years, several development applications to permit mid- and high-rise buildings have been submitted immediately surrounding the subject lands.

The current development proposal for the subject lands continues the evolution of this corridor into a high-density, transit-oriented community. A site-specific Zoning By-law Amendment for the subject lands is sought to permit the development of a 24-storey mixed use building with ground-floor active commercial uses and residential apartment units above. A Site Plan Control application to permit the proposed development is also being submitted concurrently.

2.0 Site Context

2.1 Subject Property

The subject property, which is municipally known as 1330 Carling Avenue and 815 Archibald Street, has 39.62 metres of frontage on Carling Avenue, 49.68 metres of frontage on Archibald Street, and is rectangular in shape. The property is legally known as Part of Block 8 on Registered Plan 221 and Lot 8 and Part of lot 7 on Registered Plan 529 in the City of Ottawa and is 1,968.3 square metres in size. The subject property in size is relatively small compared to neighbouring properties fronting on Carling Avenue.

An automotive sales use currently operates on the subject property, out of a two-storey commercial building. A large front-yard surface parking lot serves as outdoor storage for the vehicles. Access to the property is off Archibald Street.

2.2 Surrounding Area

The area surrounding the subject lands is characterized by a range of land uses and building forms. Along Carling Avenue are a range of commercial, retail, and residential uses in buildings ranging in height from two (2) storeys to 22 storeys. The immediately abutting and facing uses are shown in Figure 1.



Figure 1: Site Context

The surrounding uses can be described as follows:

North: Directly north of the subject lands is a six-storey office building with front yard surface parking. Further North and East is the Westgate Shopping Centre which is currently the subject of ongoing redevelopment with the first new building now under construction. North and west of the subject lands, on the north side of Carling Avenue is the on-ramp/off-ramp for Highway 417. Carling Avenue splits as it crosses under Highway 417.

East: East of the subject lands is a two-storey commercial building with retail (pharmacy), and office uses. The building fronts directly onto Carling Avenue, with a large surface parking lot to the rear. Further east is a 22-storey high-rise residential apartment building with retail uses at-grade.

South: To the immediate south of the subject lands are low-rise, ground-oriented residential buildings fronting onto Archibald Street. South of these are residential dwellings fronting onto Thames Street. The primarily low-rise residential neighbourhood south of the subject property is known as the Carlington neighbourhood.

West: Facing the subject lands across Archibald Street is the first phase of the redevelopment of the Travelodge hotel property. Phase 1 consists of a 20-storey apartment building with ground-floor retail uses along Carling Avenue and an 8-storey residential building to the south. The western portion of the site currently operates as a 3-storey hotel and is intended to be redeveloped with additional buildings (ranging from eight (8) to 22 storeys) and a public park as part of a phase 2 in the future. Further west is the Embassy Suites Retirement Home, the subject of a previous Zoning By-law Amendment application to permit additional height for two high-rise towers. Further west, along Kirkwood Avenue, are low-rise apartment buildings and a car dealership.

In April 2017, Ottawa City Council approved the Westgate Secondary Plan as well several developments in the area. The Secondary Plan was initiated by RioCan Management Inc. through their development applications to allow the redevelopment of the Westgate Shopping Centre. The Secondary Plan also addressed lands on the south side of Carling Avenue, including the subject property, recognizing their redevelopment potential and important role in providing a transition into the Carlington neighbourhood. On September 5, 2018, the City of Ottawa approved a Zoning By-law Amendment for the property immediately west of the subject lands, permitting three (3) towers along Carling with heights of 20, 22, and 20 storeys. A Site Plan Control application was approved in January 2019, permitting the first phase of that development. These and other recent development approvals and permissions are shown in Figure 2.

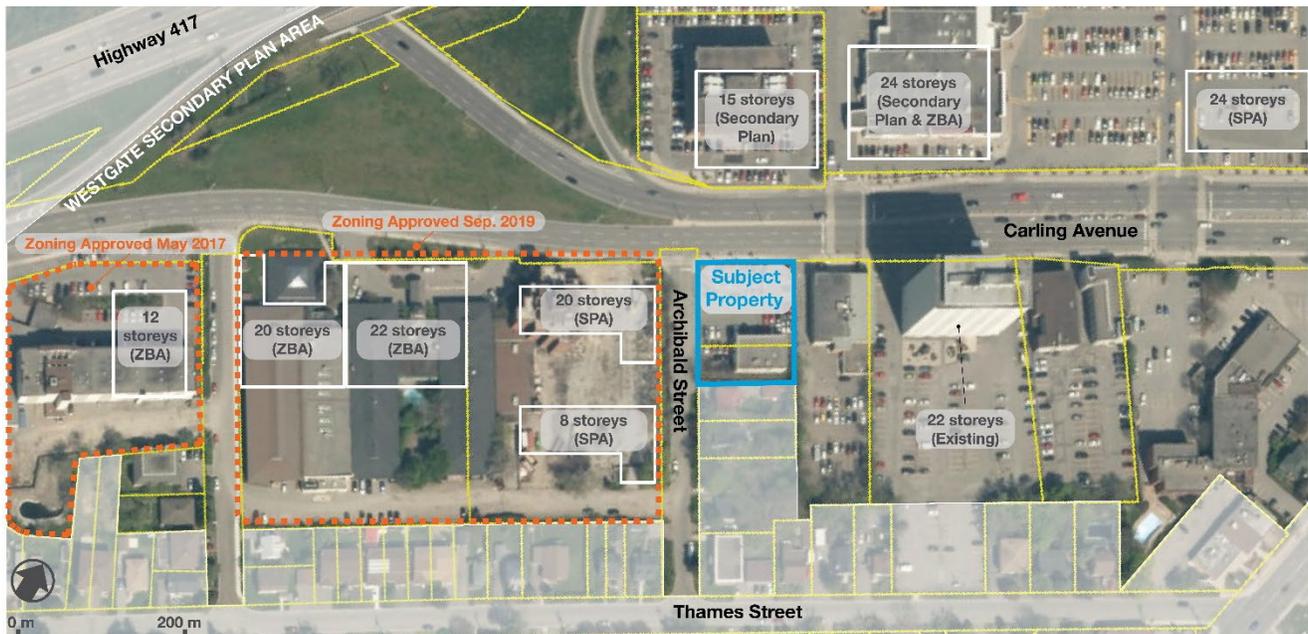


Figure 2: Heights of Existing and Approved Buildings and Permitted Building Heights

2.3 Neighbourhood Amenities

The subject property is located in the vicinity of several parks and open spaces. The largest park within walking distance, Hampton Park, is located immediately north of Highway 417 and includes amenities such as playgrounds and sports fields. Harrold Place Park and Alexander Park are both within an 800-metre radius of the property.

Future development provides an opportunity to better connect the community to these outdoor features. During the second phase of redevelopment of Westgate Shopping Centre, a privately-owned, publicly accessible space will be created to function as the primary gathering place and central focus point for new development in the Westgate area. In addition, the second phase of the redevelopment of the Travelodge property to the immediate west of the subject property will include a new neighbourhood park along Meath Street. The Carlington Community Health Centre and several public schools are located within 800 metres of the subject property.

Many commercial amenities in the vicinity of the subject property likewise support redevelopment potential. The Westgate Shopping Centre, which is located across the street from the subject property, includes a pharmacy as well as several restaurant and service commercial uses. Just north of the Queensway, a 650-metre walk from the subject property, is a commercial plaza containing a large food retail store, and LCBO and a bank outlet. Numerous retail outlets, service commercial uses, retail food stores and restaurants are located along Carling Avenue and Merivale Road, within walking distance of the subject property.

2.4 Transportation

Excellent higher-order transit service is planned to serve the Carling Avenue corridor, which is identified as an LRT route with at-grade crossings on Schedule D to the Official Plan, as shown in Figure 3. The subject property is within a 400 metre (5 minute) walk of two planned LRT stations. Timing for the design and construction of the LRT extends beyond 2031 – the Carling Corridor is identified as a Transit Priority Corridor (Continuous Measures) on the 2031 Affordable Network concept in the 2013 Transportation Master Plan.

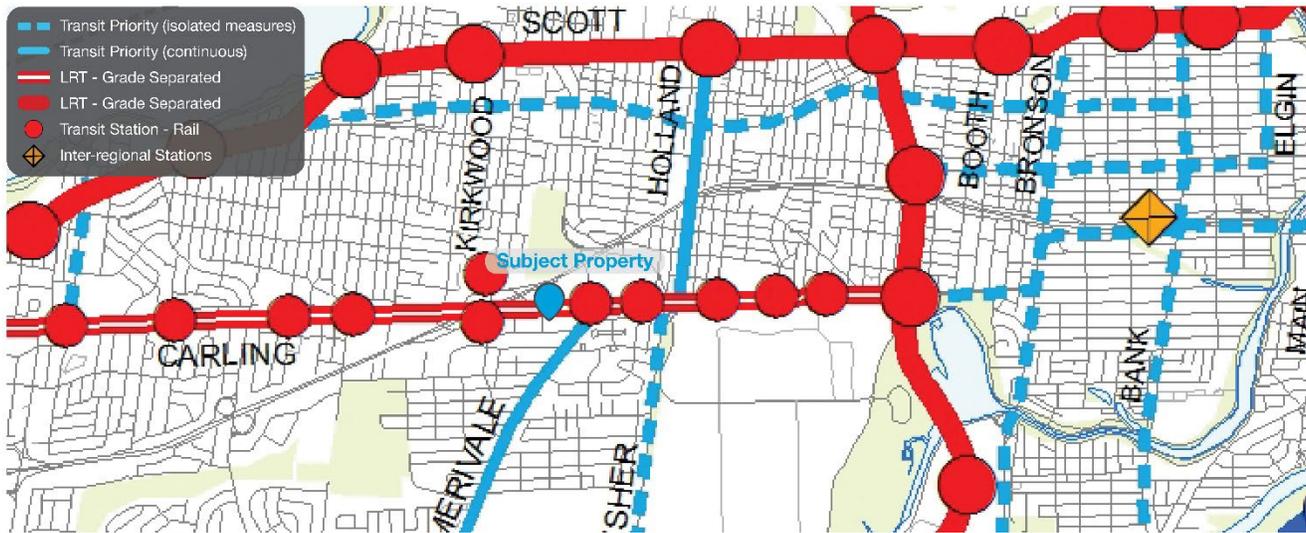


Figure 3: Planned Transit Context for the Subject Property (Extract from Schedule D of the Official Plan).

A Planning and Functional Design Study for the Transit Priority improvements is underway, and timelines are expected to be identified in the forthcoming Transportation Master Plan update. The Study is seeking a functional design for Carling Avenue that will widen sidewalks and cycling facilities in key areas and modify intersections. Adjacent to the subject

property, a bus lane is proposed with two vehicular traffic lanes. The subject property is currently well-served by several frequent and local bus routes.

A robust cycling network exists in the larger vicinity of the subject property, with protected pathways along Churchill Avenue, Byron Avenue, and the Experimental Farm offering excellent routes across the City. Safe cycling access to this larger network is currently limited, with unprotected bicycle lanes along parts of Carling Avenue and Merivale Road. Improvements to cycling infrastructure along Carling Avenue are tied to the Carling Transit Priority Measures Study. Ultimately, cycling spine routes along Carling and Merivale are planned, as shown in Schedule C to the Official Plan, excerpted in Figure 4.

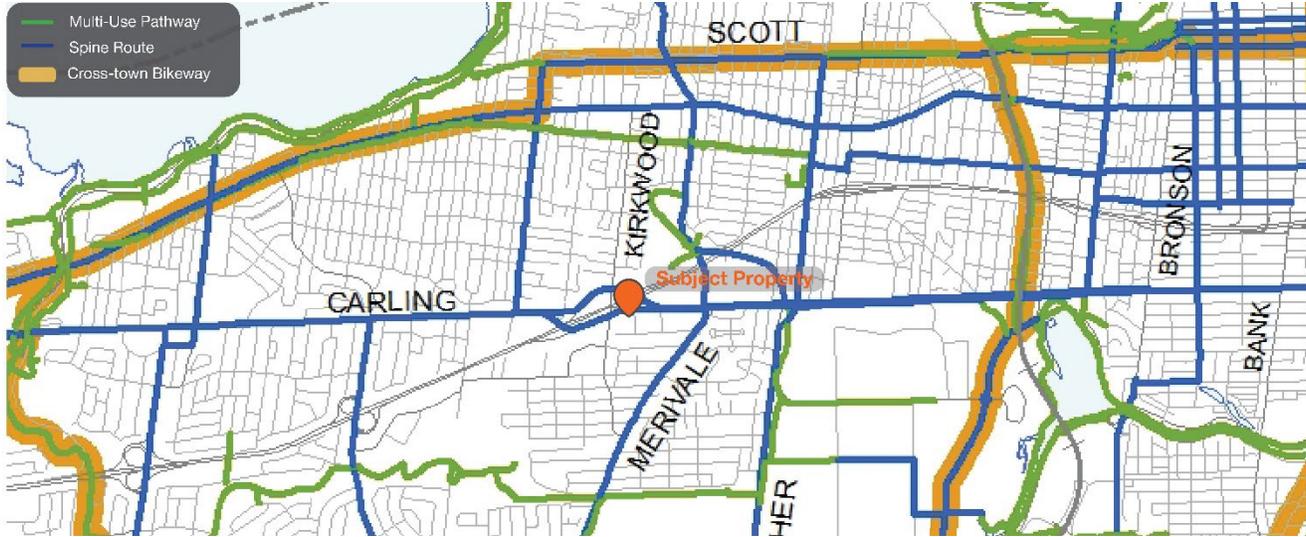


Figure 4: Planned Cycling Network (Extract from Schedule C of the Official Plan)

The subject property is bordered by Carling Avenue and Highway 417 (Queensway) to the north and Archibald Street to the west. Carling Avenue is a six (6) lane arterial road running east-west through west Ottawa. Archibald Street, a local street, currently connects Carling Avenue and Thames Street but will be modified as part of the Travelodge redevelopment to prevent vehicular access between the two streets.

Due to the centre median, only eastbound traffic on Carling Avenue can access the development via Archibald Street. The existing eastbound on-ramp to Highway 417 for vehicles travelling westbound on Carling Avenue has been closed. This forces vehicles to continue west on Carling Avenue, to loop around on Kirkwood Avenue, in order to enter the Queensway and travel eastbound.

Proposed Development

The proposed development is a 24-storey mixed-use building with commercial uses at-grade and 175 residential units above. The high-rise building is designed with a five-storey podium and a tower. Outdoor amenity area is provided on the roof of the podium and is supplemented by internal amenity area. Resident and visitor parking is located below-grade, with eight parking spaces provided at grade to serve the proposed commercial uses.

The front of the building is set back 0 metres from the protected Right of Way, but a generous landscaped area is provided within the 7.2 metre proposed ROW dedication. The ongoing Planning and Functional Design Study for Carling Avenue identifies transit and active transportation measures within the existing Right of Way, and potential further changes impacting the Right of Way dedication are over a decade from implementation. As such, the proposed landscaping will enhance the pedestrian experience as the Carling Avenue corridor continues to develop and evolve.

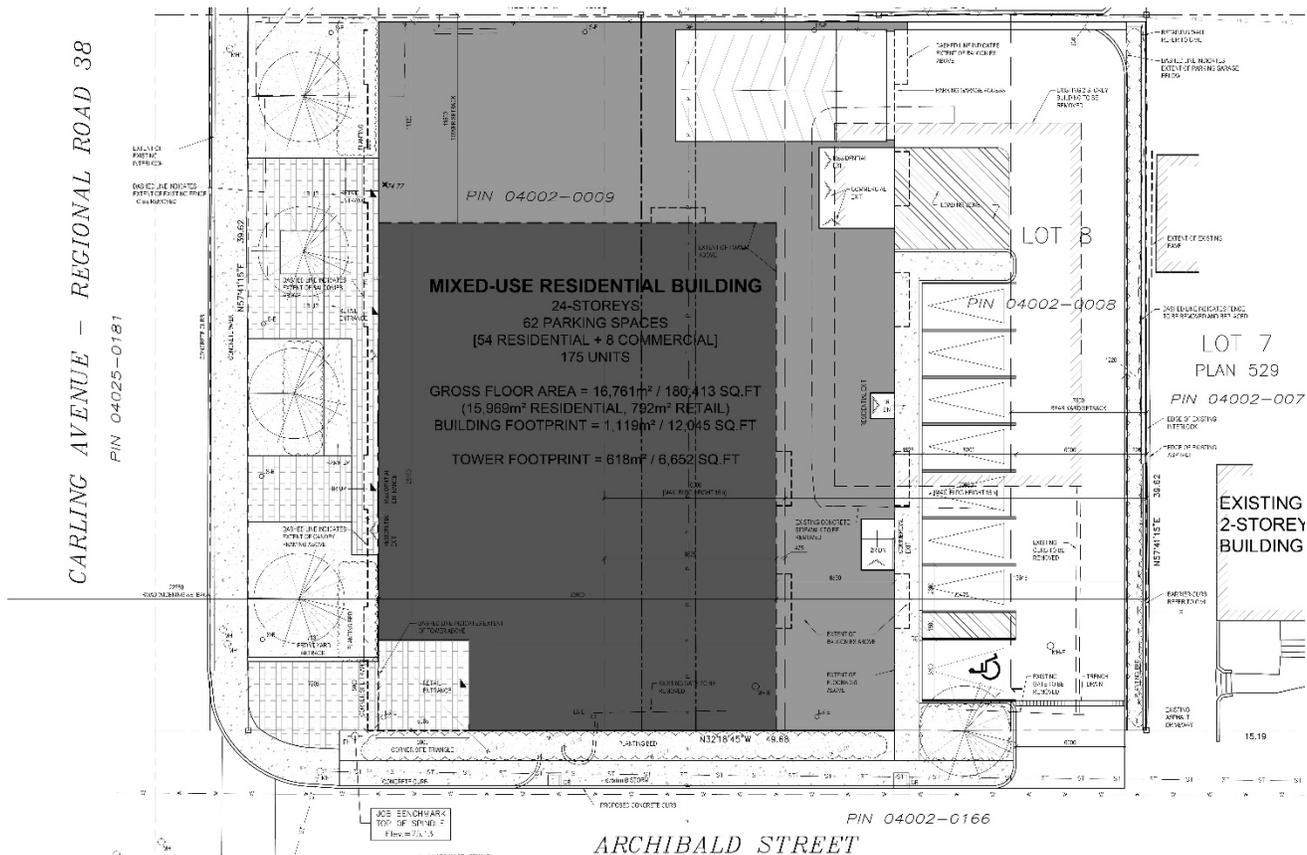


Figure 5: Site Plan Extract

The tower has a slender form, with a floorplate of approximately 620 metres. The floorplate is dimensioned to allow for a 20.5 metre tower stepback from the residential properties to the rear, and a 11.5 metre tower stepback from the adjacent Arterial Mainstreet property. The visual impact of the tower is further reduced by different façade treatments, as shown in Figure 6. The five-storey podium helps to frame a human-scaled streetscape and relates well to the existing low-rise building to the east.

The ground floor contains commercial spaces facing onto Carling Avenue, with a total commercial gross floor area of 729 square metres. The exact configuration and number of units will be adjusted dependent on tenant needs. A residential

lobby also faces Carling Avenue, ensuring a minimum of three active entrances onto the Mainstreet, as shown in Figure 6.



Figure 6: Perspective of the Proposed Development Looking from the Corner of Carling and Archibald

Amenity spaces are provided for the residents in the form of an outdoor terrace and two interior amenity rooms at the sixth floor. The provided amenity area satisfies the minimum requirements for amenity area per the Zoning By-law.

All vehicular access to the subject property is from Archibald Street. Loading and commercial parking is located to the rear of the building, within a 13.9 metre deep rear yard. The ramp to the below-grade parking garage with 36 resident and 18 visitor parking spaces is also accessed from the rear yard. Bicycle parking is provided in secure bicycle rooms in the parking garage. A planting bed provides visual screening to the property to the rear along the shared property line.

4.0 Policy and Regulatory Framework

4.1 Provincial Policy Statement, 2020

The latest version of the Provincial Policy Statement (PPS) came into effect on May 1, 2020. It provides direction on matters of provincial interest related to land use planning and development. The Planning Act requires that decisions affecting planning matters “shall be consistent with” policy statements issued under the Act.

The PPS recognizes that “the long-term prosperity and social well-being of Ontarians depends on planning for strong, sustainable and resilient communities for people of all ages, a clean and healthy environment and a strong and competitive economy”. To this end, the PPS generally promotes the creation of “healthy, liveable and safe communities”, through efficient land use patterns based on densities and a mix of land uses that efficiently use land, resources, infrastructure, and public service facilities, minimize air quality impacts, promote energy efficiency, support active transportation, are transit and freight supportive, and include a range of uses and opportunities for redevelopment and intensification. Planning authorities are to identify appropriate locations for transit-supportive development, including through intensification and redevelopment, taking into account the existing building stock and the availability of suitable existing or planned infrastructure and public service facilities (Policies 1.1.3.2 and 1.1.3.3).

New development is to have a compact form, and a mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.

Section 1.4 contains policies specific to housing and states that planning authorities shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents. This to be accomplished by:

- / Directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are, or will be, available to support current and projected needs;
- / Promoting densities for new housing that efficiently use land, resources, infrastructure and public service facilities and support the use of active transportation and transit in areas where it exists or is to be developed;
- / Establishing development standards for residential intensification, redevelopment, and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.

The PPS also states that efficient use should be made of existing and planned transportation systems, including rapid transit and cycling infrastructure. Policy 1.6.7.4 states that land use patterns, densities and a mix of uses should be promoted that minimize the length and number of vehicle trips and supports the development of viable choices and plans for public transit and other alternative transportation modes.

Section 1.8 of the PPS addresses energy conservation and climate change. Land use planning shall support reduced greenhouse gas emissions and development patterns that are resilient to the impacts of a changing climate in a variety of ways. By encouraging a mix of housing and employment uses, commutes can be shortened, reducing congestion. The impacts of a changing climate are now defined as “the potential for present and future consequences and opportunities from changes in weather patterns at local and regional levels including extreme weather events and increased climate variability.”

The proposed development is consistent with the PPS 2014, supporting the evolution of healthy, liveable and safe communities. As a site located both on an identified Transit Corridor (Carling Avenue) and facing a major Transit-Oriented Development (Westgate Shopping Centre), the intensification of the subject property with high-density residential supports transit use, efficiently uses infrastructure, and helps to provide an appropriate range and mix of housing types and commercial uses.

As a mixed-use intensification project adding significant residential density along a planned transit corridor, the proposed development contributes the available range of housing options, improves the mix of employment and housing uses, and responds to the risks of a changing climate. Specifically, the proposed development helps with climate change mitigation and adaptation by potentially reducing automobile commute journeys, and by reducing demand to convert greenfield lands that help to mitigate climate change impacts.

4.2 City of Ottawa Official Plan

The overarching policy document directing development, land use and growth in the City of Ottawa, the City of Ottawa Official Plan ('Official Plan'), is composed of eight sections. Each of these addresses a different aspect of the planned function of the City as a whole. Section 2 of the Official Plan provides Strategic Directions or growth and development within the City.

The City's population is estimated to grow to 1,136,000 individuals and 489,000 households by 2031. One third of housing growth is anticipated within the greenbelt. At the same time, average household size inside the Greenbelt is expected to decline from approximately 2.18 people in 2021 to approximately 2.12 people in 2021. Therefore, much of the anticipated demand within the Greenbelt will be for new housing in the form of smaller units such as apartments.

The City plans to meet this growth challenge by managing it in ways that support liveable communities and healthy environments. More specifically, the Official Plan pursues strategic directions in four key areas, two of which are relevant to the proposal:

1. Managing Growth
 - a. The City will manage growth by directing it to the urban area where services already exist or where they can be provided efficiently;
 - b. Growth in the urban area will be directed to areas where it can be accommodated in compact and mixed-use development, and served with quality transit, walking and cycling facilities.
2. Creating Liveable Communities
 - a. Growth will be managed in ways that create complete communities with a good balance of facilities and services to meet people's everyday needs, including schools, community facilities, parks, a variety of housing and places to work and shop; and
 - b. Attention to design will help create attractive communities where buildings, open space, and transportation work well together.

These strategic directions are developed further in the policies of Section 2.2.2 (Managing Growth) and 2.5 (Building Liveable Communities), as discussed below.

The proposed development intensifies an under-utilized property within the City's urban area and in an area identified as a target for intensification. The compact, mixed-use form of the development will encourage active transportation and transit use. The addition of retail uses to the ground floor facing Carling Avenue will provide important neighbourhood retail spaces where residents can interact, socialize, and shop in proximity to their homes in areas that are accessible by transit and active transportation modes. These uses will complement the existing retail and commercial uses along the Carling Avenue corridor and the injection of new residents to the area will support these services going forward.

4.2.1 Managing Growth

The Official Plan promotes efficient land-use patterns through intensification of locations strategically aligned with the transportation network and specifically the rapid transit network. Section 2.2.2 deals with the management of growth

within the urban area and recognizes that intensification is generally the most cost-effective pattern of development for the provision of municipal services, transit, and other infrastructure. Consequently, the Plan directs growth to locations with significant development potential, specifically those designated as Central Area, Mixed-Use Centres, Employment Areas, Enterprise Areas, Developing Communities, and Arterial or Traditional Mainstreets.

Residential intensification is broadly defined in Section 2.2.2, Policy 1 as “the intensification of a property, building or area that results in a net increase in residential units or accommodation and includes the development of vacant or underutilized lots within previously developed areas and infill development”. Arterial Mainstreets like Carling Avenue are defined as ‘Target Areas’ for intensification in Policy 3 of Section 2.2.2 of the Official Plan. The target density for Carling is 200 people and jobs per net hectare (ppj/ha) – an increase from the 2012 density of 133 ppj/ha.

A central tenet of successful intensification is the quality of built environment. Well-designed public spaces and buildings are critical factors in achieving compatibility between the existing and planned built form. The Official Plan requires that intensification proposals have full regard for their immediate surroundings and the wider area.

The subject property will be held to a higher standard for design excellence given its location within a Design Priority Area (i.e. on an Arterial Mainstreet). Policy 11 of Section 2.2.2 states that the appropriate distribution of building heights will be determined by location in a target area for intensification, proximity to a rapid transit station, and design and compatibility criteria as detailed in Section 4.11. Building heights are to be implemented through the zoning, and may be established by the Official Plan or a Secondary Plan. Buildings that are over 10 storeys are classified as high-rise with additional policy considerations for buildings that are 31 or more storeys.

Policy 20 of Section 2.2.2. recognizes that minimum parking standards can result in too much land being used for parking. To promote compact, mixed-use and transit-oriented development in intensification target areas like Arterial Mainstreets, the policy states that City will consider waiving minimum parking requirements.

The proposed development is located on the Carling Avenue Arterial Mainstreet, an identified target area for intensification and a design priority area for the City. The proposed development meets the definition of residential intensification as defined above, and helps to achieve the growth management objectives of the Official Plan in a high-rise built form. The proposed development’s response to section 2.5.1 and 4.11 is discussed below.

4.2.2 Land Use Designation

The subject property is designated “Arterial Mainstreet” on Schedule B of the City of Ottawa’s Official Plan, as shown in Figure 7. The Arterial Mainstreet designation is intended to offer significant opportunities for intensification through more compact forms of development, a lively mix of uses, and a pedestrian-friendly environment.

Arterial Mainstreets are corridors that have generally developed since 1945 and that present an urban fabric of larger lots, larger buildings, varied setbacks, lower densities, and a more automobile-oriented environment. Development along Arterial Mainstreets is intended to occur in a way that facilitates the gradual transition to a more urban pattern of land use. This means that, over time, more residential uses will be introduced and that the streets will evolve into more transit-supportive, pedestrian-oriented environments that support the surrounding community.

A broad range of uses are permitted along Arterial Mainstreets, including retail and service commercial, office, residential, and institutional uses. Redevelopment and infill are encouraged on Arterial Mainstreets in order to optimize the use of land through intensification. Development should occur in a building format that encloses and defines the street edge and provides direct pedestrian access to the sidewalk.

Per Policy 12, of Section 3.6.3 of the Official Plan, building heights up to nine (9) storeys are generally permitted on Arterial Mainstreets, unless a Secondary Plan states otherwise. As discussed below, the Westgate Secondary Plan

explicitly permits high-rise buildings on the Westgate Lands, and states that built form transition will be provided to the medium-profile Arterial Mainstreet context.

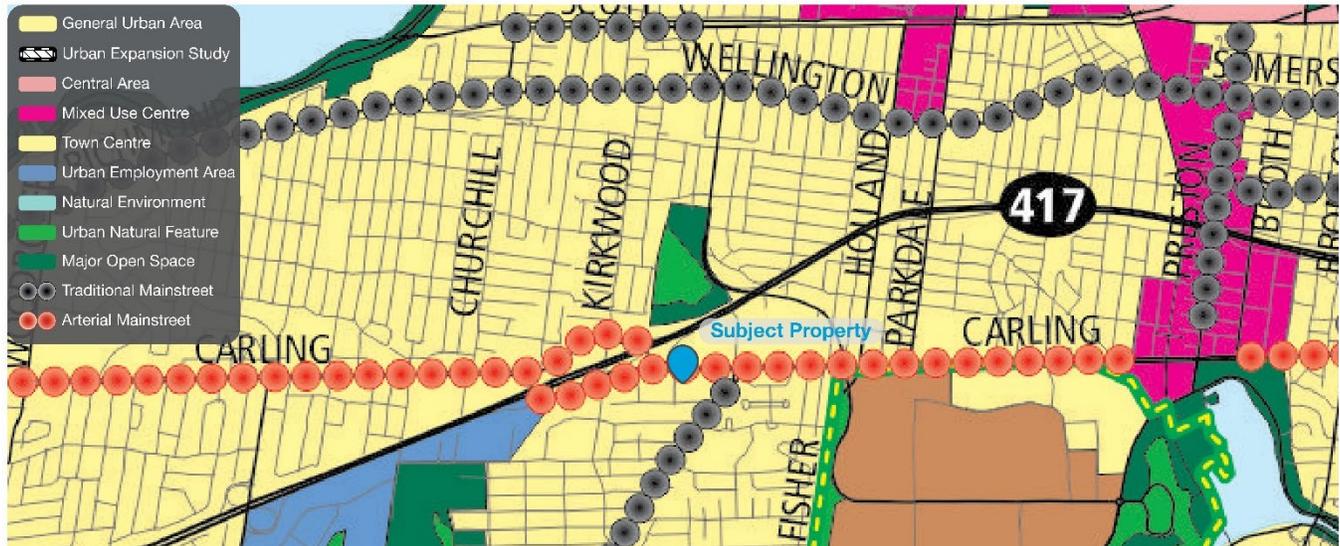


Figure 7: Land Use Designation for the Subject Property (Extract from Schedule D to the Official Plan).

The proposed building provides an appropriate transition from the Mainstreet into the low-rise neighbourhood to the south. This transition is discussed through a review of the Urban Design and Compatibility policies discussed below. The proposed building meets the requirements of Policy 12 to consider a high-rise built form through a Zoning By-law Amendment, supported by the Westgate Secondary Plan.

The proposed development exemplifies the ongoing evolution of the Carling Avenue Arterial Mainstreet from the automobile-oriented street of the past into the more urban, transit supportive, pedestrian-friendly mainstreet envisioned in the Official Plan. The proposed uses, which include residential and retail uses, will support the vision for Arterial Mainstreets as compact, mixed-use streets. The development will provide an active street edge along Carling Avenue contributing to a pedestrian-oriented streetscape.

4.2.3 Designing Ottawa

Section 2.5.1 addresses community design, setting high level objectives to encourage good urban design and high-quality architecture. The section applies particularly to new, higher-density infill in existing urban areas. Development must be sensitive to and compatible with existing communities that have developed over long periods of time. Compatible development is identified as development that, although not necessarily the same as or similar to existing buildings in the vicinity nonetheless enhances an established community and coexists with existing development without causing undue adverse impact on surrounding properties. Compatible development ‘fits well’ within the physical context and ‘works well’ with the existing and planned function.

Section 2.5.1 outlines specific Design Objectives of the Official Plan which are statements of how the City wants to influence the built environment over time. The proposed development responds to the identified Design Objectives in the following ways:

1. To enhance the sense of community by creating and maintaining places with their own distinct identity.

The proposed development contributes to the planned and emerging character of Carling Avenue at Westgate by adding active street front commercial uses and residential units at densities that support the viability of local commercial services and future transit services.

2.To define quality public and private spaces through development.

Enhanced landscaping in the public right of way will improve the pedestrian experience while the engaging design of the building, with its appropriately scaled podium and high proportion of clear glazing at the street, will help to frame Carling Avenue.

3.To create places that are safe, accessible and are easy to get to, and move through.

The added density will support transit, while the single entrance for vehicles off Archibald Street will minimize pedestrian-vehicle conflicts.

4.To ensure that new development respects the character of existing areas.

The proposed tower is set back 20 metres from the abutting low-rise residential uses, providing transition, while contributing to the planned high-density character of the Westgate Secondary Plan area.

5.To consider adaptability and diversity by creating places that can adapt and evolve easily over time and that are characterized by variety and choice.

The proposed development adds new residential units, increasing the housing variety in the Carlington neighbourhood. The tower is set back 11.5 metres from the neighbouring property to the east, and 20 metres from the future tower to the west, preserving the potential for high-rise development on adjacent properties.

The proposed development responds well to the Design Objectives set out in Section 2.5.1 of the Official Plan.

4.2.4 Urban Design and Compatibility

Section 4.11 of the Official Plan provides guidance to ensure that new development is compatible with existing areas with respect to specific issues such as noise, parking, light spillover and shadowing. The policies in Section 4.11 are intended to address a wide range of potential development types. This Planning Rationale, particularly the following sections, addresses the requirement for a Design Brief. The following table explains how the proposed development responds to the applicable policies of Section 4.11:

	Policy	Proposed Development
Building Design		
5.	New buildings will achieve compatibility with their surroundings in part through the design of the parts of the structure adjacent to existing buildings and facing the public realm.	<p>The design fits with the existing desirable character and planned function of Carling Avenue and the Westgate Secondary Plan Area in the following ways:</p> <ul style="list-style-type: none"> / The tower height provides a slight desirable variation on the existing and approved heights in the vicinity, while the five-storey podium relates well to the existing low-rise streetwall context; / The design of the ground floor façade references Carling Avenue’s commercial character; and / The pre- and post-construction grades will be similar at the perimeter of the property.
6.	Orient the principle façade and entrances to the street, include windows on elevations adjacent to public spaces, and use architectural elements, massing and landscaping to accentuate entrances.	The principle facade and multiple active entrances are oriented towards Carling Avenue. At grade-glazing provides visual connections from Archibald Street. Windows are present on all public-facing facades.

8.	Servicing, loading, and other required equipment should be internalized into the base of the building where possible, or screened from public view.	Servicing, loading, and commercial parking are located to the rear of the building and screened from the public street by landscaping.
9.	Roof-top mechanical equipment and amenity spaces should be incorporated into the design and massing of the upper floors of the building.	The mechanical room is stepped back from the tower, and clad in the same materials, to integrate the projection with the upper floors of the tower.
Massing and Scale		
10.	The appropriateness of the development will be assessed using criteria set out in the Secondary Plan.	Given the general nature of the Secondary Plan built form policies, additional criteria are addressed below.
	Where a Plan does not establish specific criteria, Council-approved Design Guidelines, and the following evaluative criteria will be used: <ul style="list-style-type: none"> / Building height, massing and scale permitted by the planned function of adjacent properties as well as the character established by the prevailing pattern of abutting and facing development; and / Prevailing patterns of rear and side yard setbacks, building separation, landscaping and outdoor amenity areas as established by existing zoning. 	<p>The subject property's lot size is small relative to other lots fronting Carling Avenue in the near vicinity. Nevertheless, as shown in Figure 2, the footprint of the proposed building and the tower footprint are in line with or smaller than other existing and approved high-rise buildings along the south side of Carling Avenue.</p> <p>The proposed slender 24-storey tower is equivalent to the permitted height on the Westgate Lands abutting Carling Avenue and offers slight variation to the existing and approved heights of 20 to 22 storeys along the south side of Carling Avenue.</p>
11.	The Shadow Analysis and Wind Analysis will evaluate the potential impacts of the development on the adjacent properties and pedestrian amenity areas. The intent of each Analysis is to demonstrate how these impacts have been minimized or avoided.	The enclosed Wind Study modelled acceptable conditions at grade across the subject property throughout the year. As shown by the enclosed Shadow Study, the proposed building creates new shadow impacts, which are cast mostly over Carling Avenue and the Westgate Lands. They are similar in scale to shadows cast by the existing neighbouring 22-storey building.
12.	Transition refers to the integration of buildings that have greater height or massing than their surroundings. Proposals for developments that are taller in height than the existing or planned context should demonstrate that an effective transition in height and massing, that respects the surrounding planned context, such as stepping down or varying the building form has been incorporated.	The proposed development has a similar height to existing and planned buildings along Carling Avenue, and similar transition to the rear. The existing and planned low-rise residential area, as defined by the Neighbourhood Line in the Secondary Plan, folds in to touch the subject property. Accordingly, a 20-metre tower setback, and stepdown to a five-storey podium has been provided to create transition to the abutting low-rise context.
13.	Building height and massing transitions will be accomplished through a variety of means, including: <ol style="list-style-type: none"> 1. Incremental changes in building height; 2. Massing (e.g. incorporating podiums along a Mainstreet); and 3. Building setbacks and step-backs. 	The proposed tower has a slender floorplate which is set back 20 metres from adjacent residential properties with maximum height permissions of four storeys. Transition is achieved through a step-down from the 24-storey tower to a five-storey podium.

High-Rise Buildings		
14.	High-rise buildings which consist of an integrated base, middle and top, can achieve urban design objectives and mitigate potential impacts.	As demonstrated by the Wind Study prepared by Gradient Wind, the building design will result in a comfortable and acceptable pedestrian environment on the subject property and immediate vicinity. Privacy impacts on residents of existing and future adjacent buildings are mitigated by tower separation distances and setbacks.
15.	High-Rise buildings that consist of an integrated base, middle and top can achieve many of the urban design objectives. The base should respect the scale, proportion, and character of the surrounding buildings and animate, adjacent streets. The tower should step back from the base and incorporate appropriate separation (generally 23 metres) from existing or future towers adjacent lots. Responsibility for tower separation shall be shared between abutting properties.	<p>The proposed high-rise building responds to these guidelines with a clear podium-and tower form. The five-storey podium includes an active commercial ground floor to animate the Carling frontage.</p> <p>The tower is set back 11.5 metres from the interior side lot line. To achieve appropriate separation, a slender tower plate of approximately 620 metres is proposed.</p>
Outdoor Amenity Areas		
19.	Applicants will demonstrate that the development minimizes undesirable impacts on the existing private amenity spaces of adjacent residential units through the siting and design of the new building(s).	The only existing or planned residential amenity area that will be affected by the proposed development is associated with the low-rise residential units to the rear of the subject property. There will not be shadowing impacts to these properties. Overlook impacts are mitigated by a 13.9 metre rear yard setback and a 20.5 metre tower setback to the rear. The proposed sixth-floor outdoor terrace is stepped back from the interior and rear edges of the podium to protect privacy.
20.	Mixed-use buildings incorporating residences will include well-designed, usable amenity areas, including private and communal amenity spaces such as: balconies, terraces and rooftop patios.	The proposal provides communal indoor and outdoor amenity area, supplemented by private balconies, in conformity with the requirements of the Zoning By-law. The rooftop amenity space is located on the east side of the tower, providing over 18 metres of separation from the adjacent residential uses.
Design Priority Areas		
22.	The portion of the buildings adjacent to the public realm will be held to the highest building design standards.	The proposed building facing the public realm includes active glazing and a playful façade treatment.
24.	The massing and scale of development will define public spaces (e.g. streets).	The proposed 5-storey podium helps to define an active street frontage along Carling Avenue.

The proposed design responds to the compatibility policies set out in Section 4.11 of the Official Plan.

4.2.5 Annex 1

Annex 1 of the Official Plan protects a 44.5 metre right-of-way for Carling Avenue, requiring a substantial Right of Way dedication from the subject property. Based on the location of the centreline, a varied ROW dedication of up to 7.93 metres would be required. A 7.2 metre ROW dedication is proposed.

The proposed 7.2 metre Right of Way dedication is sufficient and appropriate for the subject property. A 7.2 metre Right of Way dedication constitutes almost 15 percent of the area of the subject property, and any greater dedication has serious impacts for the viability of the proposed development. The existing Right of Way is large and accommodates a sidewalk, a bicycle lane and three traffic lanes in each direction. The currently planned Transit Priority improvements are located entirely within this existing 30 metre Right of Way and will not be superseded by higher-order transit improvements until after 2031 at the earliest, based on the 2013 Transportation Master Plan.

Emerging planning and land use directions in the City of Ottawa, as articulated in the New Official Plan documents and Climate Change Master Plan, emphasize a significant modal shift away from private automobile use to transit, cycling and walking. In combination with the proposed 7.2 metre Right of Way dedication and a reduction in the road area dedicated to vehicular traffic will provide space for a wide range of possible Rapid Transit investments beyond 2031.

4.3 City of Ottawa Official Plan Update

The City of Ottawa is currently undertaking an Official Plan review, which will culminate in a new Official Plan, projected to be adopted by Council in Summer 2021. The first phase of the New Official Plan process was completed in Fall 2019, and Council has approved high-level policy directions.

While documents and policy directions published through the new Official Plan process do not yet represent actual policies, five “Big Moves” have been identified. These include the following relevant moves:

1. Achieve, by the end of the planning period, more growth through intensification than by greenfield development.
2. By 2046, the majority of trips in Ottawa will be made by sustainable transportation.
4. Embed public health, environmental, climate and energy resiliency into the framework of our planning policies.

One of the core organizing concepts for the new Official Plan will be the “15-minute neighbourhood”: the idea that most people will be able to access the majority of their daily destinations, not including employment, within a 15-minute walk of their homes.

It is also important to note that the new Official Plan will be based on the City of Ottawa’s Climate Change Master Plan and Energy Evolution strategy. In January 2020, Council committed to reduce greenhouse gas emissions by 100 per cent by 2050 – a goal which will have significant implications for land use patterns.

The proposed development will facilitate the development of a 15-minute neighbourhood, add substantial intensification, and contributes to a land use pattern that is consistent with significant emissions reductions.

4.4 Westgate Secondary Plan

Official Plan and Zoning By-law Amendment applications were submitted in December 2015 to facilitate the phased redevelopment of the Westgate Shopping Centre at 1309 Carling Avenue, resulting in a Secondary Plan for Westgate Shopping Centre and lands on the south side of Carling Avenue, including the subject property. The Secondary Plan was approved by Council on April 12, 2017.

The guiding principles of Section 2.2 state that the role of the Westgate-Carling South Transition Area is to support the varying roles of Carling Avenue - living, working, shopping, socializing, transportation, and ultimately a street that is

enjoyable for pedestrians and cyclists. Development within this area should provide transitional built form and strong urban design to recognize and protect the low-rise residential context to the south. Finally, development should ensure a safe, identifiable network of sidewalks and cycling lanes that connect to nearby greenspaces, parks, transit corridors and stations, and other destinations. The Secondary Plan provides limited land use direction for the Westgate-Carling South Transition Area in Section 3.2.

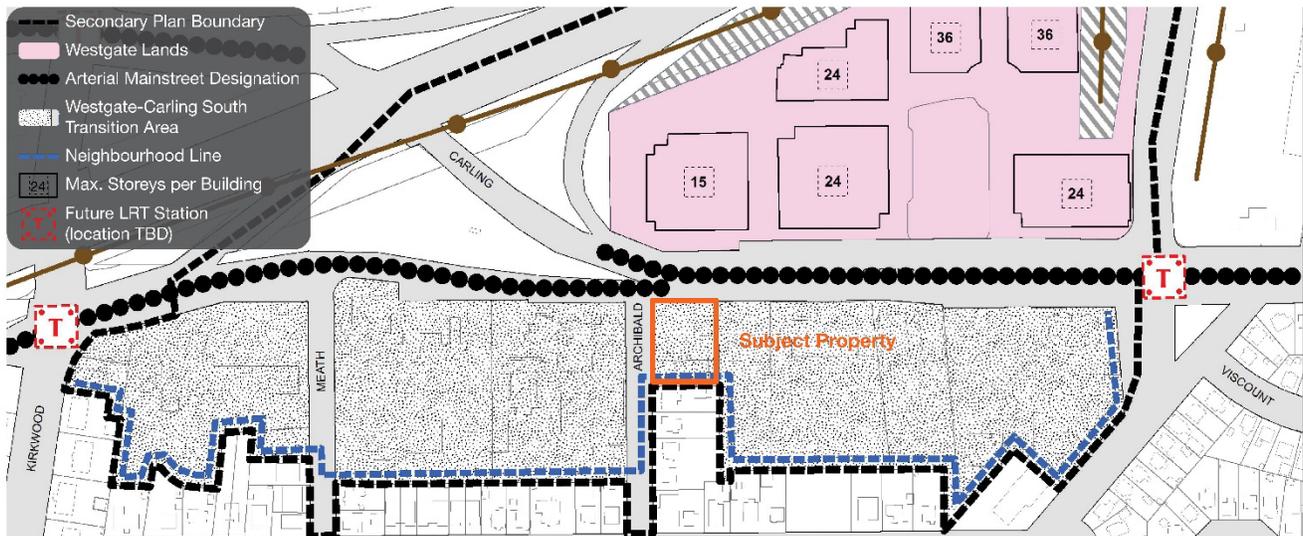


Figure 8: Extract from Schedule A to the Westgate Secondary Plan

Section 3.3 contains policies relating to the defined Neighbourhood Line which is intended to delineate the stable, low-rise areas of the Carlington neighbourhood from the lands that front onto Carling Avenue. The purpose of the neighbourhood line is to establish a clear distinction between areas that are anticipated to change over time and ones that are anticipated to undergo very little change outside of small scale infill. Developments on the north edge of the Neighbourhood Line are required to allow for appropriate transition in terms of building height and uses, setbacks, landscaping, and other measures in order to protect the lower profile character of the area to the south. As shown in Figure 8, the neighbourhood line generally follows the rear lot line of properties fronting Thames Avenue, but folds inward to the rear property line of the subject property.

Finally, Section 3.4 of the Secondary Plan provides direction on the creation of an attractive and functional public realm. Only policy 3 is applicable to the subject property as it states that the placement and form of buildings along Carling Avenue must contribute to the creation of a complete street with an active and animated frontage along both sides of Carling Avenue. The active and animated street characteristics require active entrances, siting buildings close to the street, transparent glazing in buildings along the street, and vehicle parking screened from view of the street.

The proposed development conforms to the policies of the Westgate Secondary Plan. It will contribute to an active street frontage on Carling Avenue, while providing transition compatible with the other existing and approved buildings located in the Westgate-Carling South Transition Area.

4.5 Urban Design Guidelines for High-Rise Buildings

The Urban Design Guidelines for High-Rise Housing were approved by City Council in May 2018. The guidelines apply to any building that is 10 storeys or greater in height and are intended to address the compatibility and relationship between high-rise buildings and their existing or planned context.

The guidelines address the design of high-rise buildings in relation to their context, built form, and impact on pedestrian realm. The intent of these guidelines is not for use as prescriptive a checklist, but rather for the guidelines to be considered and applied as is appropriate for the proposed development type and site characteristics and context.

The following design guidelines would be applicable to the development:

- / As a background building, the proposed development respects and enhances the overall character of the existing and planned skyline by maintaining a harmonious relationship with the neighbouring buildings with similar but varied building height, a playful façade design, and slender tower massing (Guidelines 1.9 and 1.11);
- / The building base is five storeys in height, helping to evolve a new mid-rise streetwall context and urban fabric (Guidelines 1.12, 2.1a, 2.15 and 2.17);
- / The subject property exceeds the recommended minimum lot size for high rise buildings (1.16)
- / The ground floor of the base is animated and highly transparent (2.23);
- / The tower floorplate is approximately 620 square metres, well under the recommended maximum floorplate of 750 square metres, and is set back 11.5 metres from the interior side property lines (Guidelines 2.24 and 2.25);



Figure 9: Perspective of Proposed Tower from South

- / The primary residential and commercial pedestrian entrances face Carling Avenue seamless connections to the sidewalk (Guidelines 3.10 and 3.12a-b);
- / A ground floor height of 4.8 metres is provided to allow for flexibility in use over time (Guideline 3.12 c);
Parking is located underground and to the rear of the building (Guideline 3.14) and all servicing, loading, pick-up/drop-off, and utilities are located to the rear of the building (Guidelines 3.15, 3.26 and 3.17).

The proposed development responds strongly to the Urban Design Guidelines for High Rise Development.

4.6 Urban Design Guidelines for Development along Arterial Mainstreets

The Urban Design Guidelines for Development along Arterial Mainstreets were approved by Council in May 2006. These guidelines provide urban design guidance in order to assess, promote, and achieve appropriate development along Arterial Mainstreets. The guidelines address seven aspects of development, including: streetscape, built form, pedestrians and cyclists, vehicles and parking, landscape and environment, signs, and servicing and utilities.

The redevelopment of the subject property responds to the following relevant guidelines:

- / The new building is located along the public street edge (Guideline 1);
- / The enclosed landscape plan shows a generous 7.2 metre planted boulevard, with wide pedestrian connections between the building's entrances and the Arterial Mainstreet (Guideline 2);
- / The building is set back 0 metres from the property line following Right of Way dedication, 0 to 3.0 metres back from the front property line, and 0 to 3.0 metres back from the side property line for corner sites, in order to define the street edge and provide space for pedestrian activities and landscaping (Guideline 6);
- / The proposed development is an intensified, mixed-use development at an important node (Guideline 11);
- / The built form relates to existing and planned high-rise development on adjacent properties to create a coherent streetscape (Guideline 12); and
- / The proposed building occupies the majority of the lot frontage and the corner side yard, with an entrance located near the corner of the building (Guideline 13).

The proposed development responds strongly to the Urban Design Guidelines for Development along Arterial Mainstreets.

4.7 Comprehensive Zoning By-law

The subject property is zoned "Arterial Mainstreet, Subzone 10 (AM10)", as shown in Figure 10. The AM zone permits a broad range of uses including retail, service commercial, offices, residential and institutional uses in mixed-use buildings or side by side in separate buildings. The purpose of the AM zone is to impose development standards that will promote intensification, while ensuring that they are compatible with the surrounding uses.

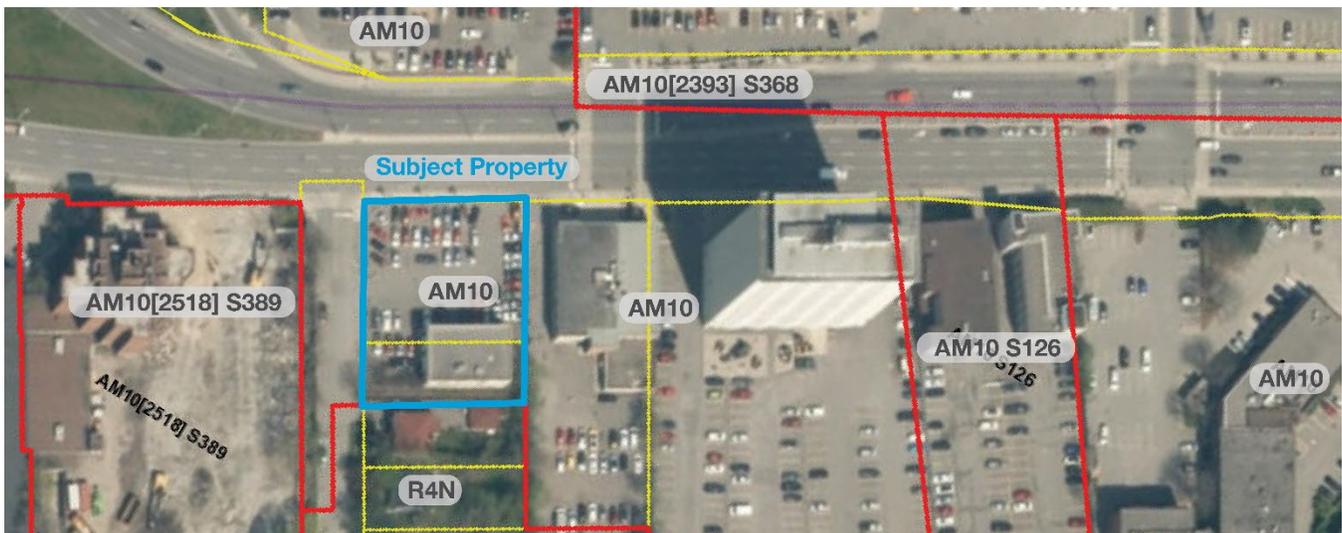


Figure 10: Zoning for the Subject Property

Height transition to low-rise is built into the AM parent zone, with 30 metres (or as shown on the zoning map) permitted generally, but maximum heights of 15 metres within 20 metres of a lot line abutting an R4 zone, and a height of 20 metres between 20 and 30 metres from an R4 zone. Given the limited depth of the subject property relative to its neighbours, this would restrict the majority of the subject property to building heights of four to six (4-6) storeys.

The AM10 subzone was introduced through By-law 2015-45 to implement the Arterial Mainstreet policies of OPA 150. The AM10 subzone introduces “Active Street Frontage” provisions in order to meet the design objectives of the Official Plan. These provisions are designed to:

- / Locate buildings with ‘active entrances’ at or close to the front and corner side lot lines;
- / Provide for a minimum amount (50%) transparent glazing and active customer and residential entrances at grade;
- / Appropriately phase new developments through the Site Plan Control process; and,
- / Provide greater separation to abutting residential uses.

The following Zoning Requirements apply to the proposed development.

Provision	Requirement	Proposed	Compliance
Lot Area	No minimum	1,969 m ²	✓
Lot Width	No minimum	39.6 m	✓
Front Yard	No minimum for mixed-use building	7.2 m (0 m after ROW dedication)	✓
Corner Side Yard	No minimum for mixed-use building	0 m	✓
Interior Side Yard	No minimum	0.4 m	✓
Rear Yard	3 m for the first 20 m from Archibald; 7.5 m otherwise	13.9 m	✓
Frontage Requirement	50% of front and corner side lot lines must be occupied by building within 3 m of lot lines	Archibald: 55.5% Carling: 86%	✓
Active Frontages	Minimum 50% of ground floor (to 4.5 m) composed of glazing and active entrances	Archibald: 52% Carling: 74%	✓
Active Entrances	Min. 1 active entrance per ground floor occupancy immediately adjacent to front/corner side lot line and 1 residential entrance facing front and corner side lot lines	Entrances facing Carling only	✗
Minimum Building Height	Within 10 m of front & corner side lot lines ground floor must be 4.5 m and total height must be at least 2 storeys (7.5 m)	74.8 m	✓
Maximum Building Height	Within 20 m of R4 zone: 15 m 20-30 m from R4 Zone: 20 m 30+ m from R4 Zone: 30 metres (9 storeys)	Within 20 m of R4: 17.2 m 20+ m from R4: 74.8 m	✗
Minimum Parking (Area Y) No parking required for first 12 residential units	Residential: 175 units (-12) @ 0.5/unit = 82 Visitor: 175 units (-12) @ 0.1/unit: 16 Non-res varies, typically: 792 m ² @ 1.25/100 m ² GFA: 10	Residential: 36 Visitor: 18 Commercial: 8 Total: 62	✗

Provision	Requirement	Proposed	Compliance
Parking Location	Not in required front or corner side yard	Below-grade/rear yard	✓
Aisle / Access	Minimum 6 m drive aisles for parking garage.	Varies/ min 6 m	✓
Loading	0 spaces for < 2,000 m ² non-residential GFA	1 loading area	✓
Landscaping	3 m abutting streets and 15% landscape area	1.6 m buffer 17.8% landscaped area	✗ ✓
Outdoor Loading	Within parking lot, set back min 9 m from street frontages and 3 m from other lot lines	None provided	✓
Bicycle Parking	Res: 175 units @ 0.5 spaces per unit: 88 Non res: 792 m ² @ 1/250 m ² GFA: 3	156	✓
Amenity Area	175 units @ 6 m ² per unit = 1,050 m ² 50% communal: 525 m ²	Total: 1,403 m ² Communal: 525 m ²	✓

The proposed development requires relief from the maximum height and minimum residential parking requirements of the Zoning By-law. Minor relief is also required from the AM10 active entrance provisions that apply to the Archibald Frontage. The proposal complies with the remainder of the zoning requirements.

4.7.1 Required Zoning Relief

Active Entrances on Archibald Street

The AM10 provisions require active entrances from each individual ground-floor occupancy to each abutting front and corner side-yard façade. They also require active residential entrances to both front and corner side yard facades. Relief from this provision will allow a more efficient ground-floor layout that focuses pedestrian activity on Carling Avenue. Visual connections to Archibald Street will be maintained with ample ground-floor glazing.

Archibald Street is a local road, and vehicular connections to Thames Street will be closed, leaving it to function as a pedestrian connection to the neighbourhood and as loading and servicing access to the Arterial Mainstreet developments fronting it.

The requested relief meets the intentions of the Arterial Mainstreet policies of the Official Plan and responds to the intent of the relevant urban design guidelines. The proposed building design appropriately addresses the hierarchy of public spaces by focusing pedestrian activity onto Carling Avenue.

Increase in Maximum Height Requirements

It is proposed to permit a minimum height within 20 metres of an R4 zone of 17 metres, whereas the AM10 provision permit a maximum height of 15 metres, and a maximum height 20 metres or more from an R4 zone of 75 metres, whereas the zoning by-law permits a maximum height of 20 metres within 30 m of an R4 zone and 30 metres otherwise.

The requested increase in minimum height within 20 metres of an R4 will allow the development of a five-storey podium; typically, a five-storey built form could be accommodated within a 15-metre built form. To allow for an extra-height ground floor, as called for by the Official Plan and the Council-approved design guidelines, an increase in minimum height is requested which will permit a 4.8 metre ground floor.

The request to permit a maximum height of 75 metres 20 or more metres from property lines abutting an R4 zone will permit the development of a 24-storey high-rise building. This zoning change will permit a high-rise development that is

consistent with building heights along the south side of Carling Avenue in the Westgate Secondary Plan area while providing variation and visual interest.

A Zoning By-law Amendment to permit high-rise development on the subject property is appropriate under Policy 12 of Section 3.6.3 of the Official Plan. The proposed height is of a similar scale to nearby existing and proposed development, will facilitate greater intensification in line with Official Plan policies, and adequate transition to adjacent low-rise development is provided.

Reduction in Minimum Parking Requirements

A total of 62 vehicular parking spaces is proposed, whereas a total of 108 spaces is required by Section 101 of the Zoning By-law. All resident and visitor parking is provided below grade, and visitor parking is provided at the required rate.

The subject property is located within a development node as defined by the Westgate Secondary Plan and lies along an Arterial Mainstreet and Transit Priority Corridor. A reduction in minimum parking standards to promote transit-oriented development, can be contemplated under Policy 20 of Section 2.2.2 of the Official Plan.

A reduction in required resident parking will facilitate the development of a high-density, mixed use building and support public transit use, in conformity with the policies of the Official Plan and consistent with the intensification objectives of the PPS. Given the small size of the lot, at least one additional level of underground parking would be required to meet the current zoning standard. Below-grade parking spaces are costly to construct, negatively impacting the affordability of created dwelling units.

Eight commercial parking spaces is provided. A range of commercial uses, many of which have very different minimum parking requirements, are permitted for the ground floor occupancy – the ultimate requirement based on section 101 of the Zoning By-law could vary from 0 to 40 parking spaces. It is therefore proposed that the number of commercial parking spaces for the development be specified at eight (8) spaces to service the ground floor commercial uses.

An appropriate number of commercial parking spaces is provided to support a wide range of potential permitted commercial uses. Defining the minimum parking requirement for these uses will provide flexibility, allowing for a range of potential tenants to occupy the commercial units and activate the street frontage.

Reduced Landscape Buffer

It is also requested to permit a reduced landscape buffer of 1.5 metres between the eight-space surface parking lot and Archibald Street. The landscape buffer extends for only 5.4 metres along Archibald Street, and any impact will be mitigated by the planting of a deciduous tree in the buffer.

This reduction facilitates a compact site plan and does not result in any undue adverse impacts.

4.8 Section 37

Section 37 authorizes a municipality with appropriate Official Plan provisions to pass Zoning By laws involving increases in the height or density otherwise permitted, in return for the provision by the owner of community benefits. The community benefits must be set out in the Zoning By-law amendment and then secured in an agreement registered on title. The increase in height and/or density is an incentive to the developer to provide community benefits at no cost to the City within the local community in which the contributing development project is located. In general, a Section 37 benefit is required if the proposed development constitutes an increase of over 25-percent of the existing density allowed on the property. The Section 37 Agreement will be executed prior to the introduction of the by-law that implements the Zoning By-law Amendment for the increased density and/or height.

Given the magnitude of the proposed increase in density, it is anticipated that Section 37 benefits will be required.

5.0 Supporting Studies

5.1 Site Servicing and Stormwater Management Plan

A Site Servicing and Stormwater Management Report was prepared in support of the proposed development by DSEL Ltd. It is proposed to service the development via a water connection to existing pipes within the Archibald Street and Carling Avenue Rights of Way, via a sewer connection to existing pipes in the Archibald Street Right of Way, and via stormwater outlets to the existing municipal storm sewer within Archibald Street. The proposed servicing plans for water, sanitary and stormwater service meet the relevant City of Ottawa guidelines, and the development is recommended from a site servicing perspective.

5.2 Noise and Vibration Study

Paterson Group conducted an Environmental Noise Control Study for the proposed development. Environmental noise levels, including traffic noise, will require standard mitigation measures for the northern, eastern and western elevations. No noise mitigation is required for the proposed outdoor amenity area.

5.3 Landscape Plan and Tree Conservation Report

The Tree Conservation Report, prepared by IFS Associates, identifies 11 trees on or near the subject property, all located along the rear property line. Of these, ten are identified for removal, due to conflicts with the proposed development. The 11th tree, which is located on the property to the south, is a dead Ash tree, and is recommended for removal.

The landscape plan, prepared by Gino J. Aiello Landscape Architect, proposes four new Ginkgo trees to be planted in the Carling Avenue Boulevard, and one new Ginkgo tree to be planted in the landscape buffer between the parking lot and Archibald Street. A mix of native and naturalized shrubs is proposed to be planted along the rear property line, replacing the vegetated buffer provided by the removed trees.

5.4 Wind Analysis

A Wind Analysis conducted by Gradient Wind Engineers and Scientists predicted acceptable at-grade wind conditions throughout the year. The proposed common amenity terrace is comfortable for sitting in all areas at the summer season. Additional mitigation measures are not recommended.

5.5 Geotechnical Study

A Geotechnical Investigation was conducted by Paterson Group to evaluate the suitability of the subject property to accommodate high-rise development. The investigation found that the property is suitable for the proposed development from a geotechnical perspective, and made recommendations related to foundation design.

5.6 Environmental Site Assessments

Paterson Group prepared a Phase 1 Environmental Site Assessment (Phase 1 ESA) for the subject property (February 2020), that identified some areas of potential environmental concern. On this basis, the Phase 1 ESA recommended that a Phase 2 Environmental Site Assessment (Phase 2 ESA) be conducted. The Phase 2 ESA did not identify contamination on the subject property, and no remediation was recommended. The Phase 1 ESA did recommend that a Designated Substances Survey be undertaken for the existing building on the property prior to demolition.

6.0 Public Consultation Strategy

A Public Consultation Strategy is planned to ensure adequate consultation of members of the community. At the time of application submission, the Province of Ontario is in a state of emergency due to the global COVID-19 pandemic, and in-person meetings and open houses are not possible. Accordingly, some components of the strategy will likely be adjusted, either by delaying until the resolution of the state of emergency, or by moving components of the consultation to a virtual format. It is anticipated that new protocols for consultation will emerge over the coming weeks, and appropriate approaches will be determined in consultation with the Ward Councillor and municipal staff.

The following steps in the consultation strategy are proposed:

- / Email notification to Councillor Brockington's office and the Carlington Community Association in advance of application submission, resulting in a meeting to discuss the proposal on May 1, 2020;
- / Notification of neighbouring property owners and posting of public signage, to be completed by City staff;
- / Preparation of a short information package to be distributed virtually, including a contact address and number for Fotenn to collect community feedback; and
- / Statutory public meeting at Planning Committee.

In partnership with the City of Ottawa, all public engagement activities will comply with Planning Act requirements, including circulation of notices and the Statutory Public Meeting.

7.0 Conclusions

It is our professional opinion that the proposed Zoning By-law Amendment and concurrent Site Plan Control Application to permit a 24-storey building on the subject property constitutes good planning and is in the public interest. As outlined in the preceding sections:

- / The proposed development is consistent with the direction of the Provincial Policy Statement with regard to intensification of lands that are already serviced and that are in proximity to amenities and services.
- / The proposed height is generally consistent with existing and planned building heights for buildings facing Carling Avenue, while creating variation;
- / The requested Zoning By-law Amendment conforms to the current height policies of the Official Plan and the applicable policies of the Westgate Secondary Plan;
- / The requested height increase and reduction in minimum parking requirements will allow greater intensification and the addition of residential density to a target area for intensification, helping to implement the growth management policies of Section 2.2.2 of the Official Plan;
- / The development responds strongly to the Urban Design Guidelines for Development along Arterial Mainstreets and for High-rise Development.
- / The development will allow the redevelopment and intensification of a relatively small underutilized site within a mixed-use development node defined by the Westgate Secondary Plan;
- / The proposed uses are permitted and the proposed building achieves the intent of the active street frontage provisions of the Zoning By-law; and
- / The proposed development is supported by technical studies submitted as part of this application.

Sincerely,



Bria Aird, M.PL.
Planner



Paul Black, MCIP RPP
Senior Planner