



403 Richmond Road

Planning Rationale + Design Brief
Official Plan Amendment + Zoning By-law Amendment
September 8, 2020



Prepared for Starwood Group

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1.0

Introduction

Fotenn has been retained by Starwood Group ('Starwood') to assess the appropriateness of a proposed redevelopment of their lands known municipally as 403 Richmond Road and 389 Roosevelt Avenue ('subject property') in the Westboro neighbourhood of the City of Ottawa. Based on the findings of our analysis, development of a nine-storey mixed-use building with a penthouse amenity room is an appropriate use of the subject property. Fotenn has prepared the following Planning Rationale and Design Brief in support of the enclosed Official Plan Amendment and Zoning By-law Amendment applications, required to facilitate appropriate development of the subject lands.

1.1 Purpose of the Applications

Since the adoption of the Richmond Road / Westboro Secondary Plan in 2008, the section of Richmond Road around the subject property has experienced significant residential intensification, mostly in the form of taller mid-rise buildings with ground floor commercial for those projects along Richmond Road. The proposed development reflects the desirable existing character and function of the Richmond Road corridor. It also reflects municipal investments in infrastructure, particularly the planned extension of the existing Light Rail (LRT) system westwards as part of Stage II. Overall, this intensification has allowed more people to live within a 15-minute community and has supported the vitality of Richmond Road as a mainstreet and community corridor – both key objectives identified in the new Official Plan process.

The enclosed Official Plan and Zoning By-law Amendment applications seek to amend the Secondary Plan and Zoning By-law to permit a nine-storey mixed use building with a penthouse amenity room on the subject property.



Figure 1: Subject Property

The subject property is located in the Westboro neighbourhood of the City of Ottawa, a distinct neighbourhood centred on Richmond Road and bounded by the Ottawa River to the north and by Island Park Drive to the east.

2.1 Subject Property

The subject property, which is municipally known as 403 Richmond Road and 389 Roosevelt Avenue, has a frontage on Richmond Road of approximately 27.8 metres, and a frontage on Roosevelt Avenue of approximately 85.8 metres. The total area of the property is approximately 2,589.8 square metres. The property is generally rectangular, with a slight skew in the front lot line due to Roosevelt Avenue and Richmond Road intersecting at an acute angle.

A funeral home use, with frontage on Richmond Road, and surface parking in the corner side and rear yards, currently occupies 403 Richmond Road. A detached home currently occupies 389 Roosevelt Avenue.

2.2 Land Use Context

The subject property is defined by two land use contexts. Richmond Road is a traditional mainstreet, characterized by small-scale, street-fronting retail, often with residential or office units located above. Generally, older buildings along Richmond Road are one to three storeys in height, while more recent development is mid-rise in height, although exceptions exist. Within the area centred around Richmond Road and Berkley Avenue, a mid-rise node has developed, as shown in Figure 3: Building Height Context.

To the north of Richmond Road, along Roosevelt Avenue, the land is developed as a predominately low-rise residential community, characterized by detached and semi-detached homes.

The following land uses are found in the vicinity of the subject property:

/ North

Directly north of the subject property is a semi-detached home, with similar uses characterizing the stretch of Roosevelt Avenue north of Richmond Road, as shown in image two on Figure 2.

Approximately 300 metres north of the property is the Transitway that is being converted into an LRT corridor through the City's stage 2 LRT project with the existing Dominion BRT Station becoming an LRT station. Further north is the Ottawa River and associated parks, including the Westboro Beach and Kitchissippi Lookout.

/ **East**

East of the subject property, low-rise small-format retail uses extend approximately 40 metres in depth from Richmond Road along Winston Avenue. North of them is a semi-detached home, also abutting the subject property, as shown in image three on Figure 2.

A similar land use pattern extends east along Richmond Road for approximately half a kilometre.

/ **South**

The southeast corner of the intersection of Roosevelt Avenue and Richmond Road is occupied by a four-storey mixed-use building with an at-grade restaurant use and offices above. At the southwest corner of the intersection is an eight-storey mixed use building, constructed between 2008 and 2011, with retail uses at grade. Both of these properties are approximately 40 metres in depth and have frontage on both Richmond Road and Byron Avenue/Danforth Avenue.

South of Byron, a low-rise residential community extends towards Carling Avenue.

/ **West**

Directly west of the subject property, across Roosevelt Avenue, are three detached homes and a recently constructed semi-detached home. The detached homes are the subject of a Council-approved Official Plan Amendment and Zoning By-law Amendment application, currently under appeal to the Local Planning Appeals Tribunal, to permit a six-storey mixed use building.

Facing Richmond west of Roosevelt is a low-rise commercial building. Further west is a nine-storey mixed use building with retail at-grade and residential units above, and multiple mid- and high-rise buildings, as shown in Figure 3.



Figure 2: Subject Property and Surrounding Land Use Context

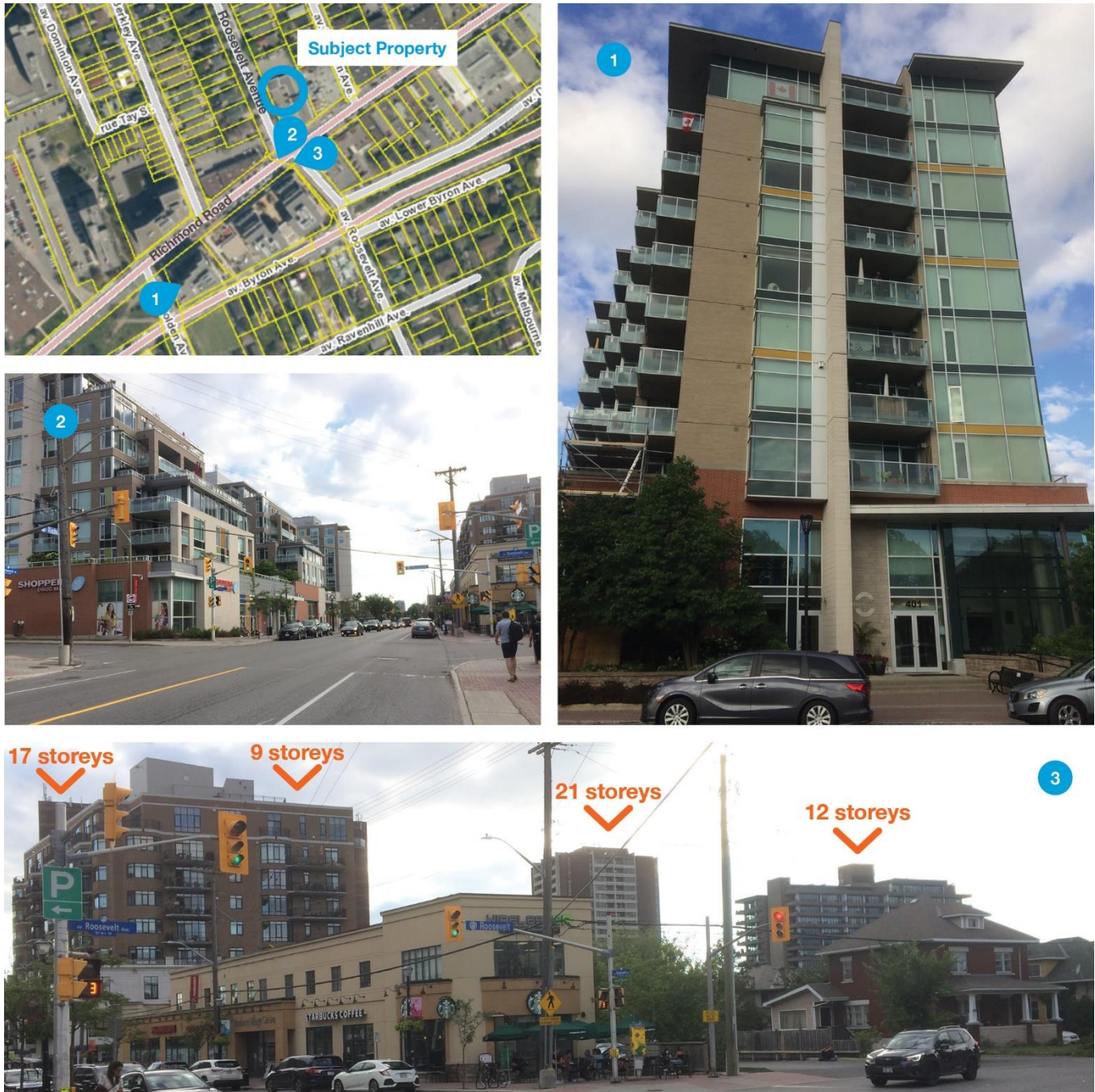


Figure 3: Building Height Context

2.3 Transportation Network

A robust, multi-modal transportation network supports the Westboro neighbourhood. The following infrastructure allows for easy mobility through the neighbourhood and good connections to the rest of the City:

- / The subject property is a 425-metre or 5-minute walk from Dominion Station, currently a station on the Transitway, which is planned to be converted to an LRT station, as shown in Figure 4;

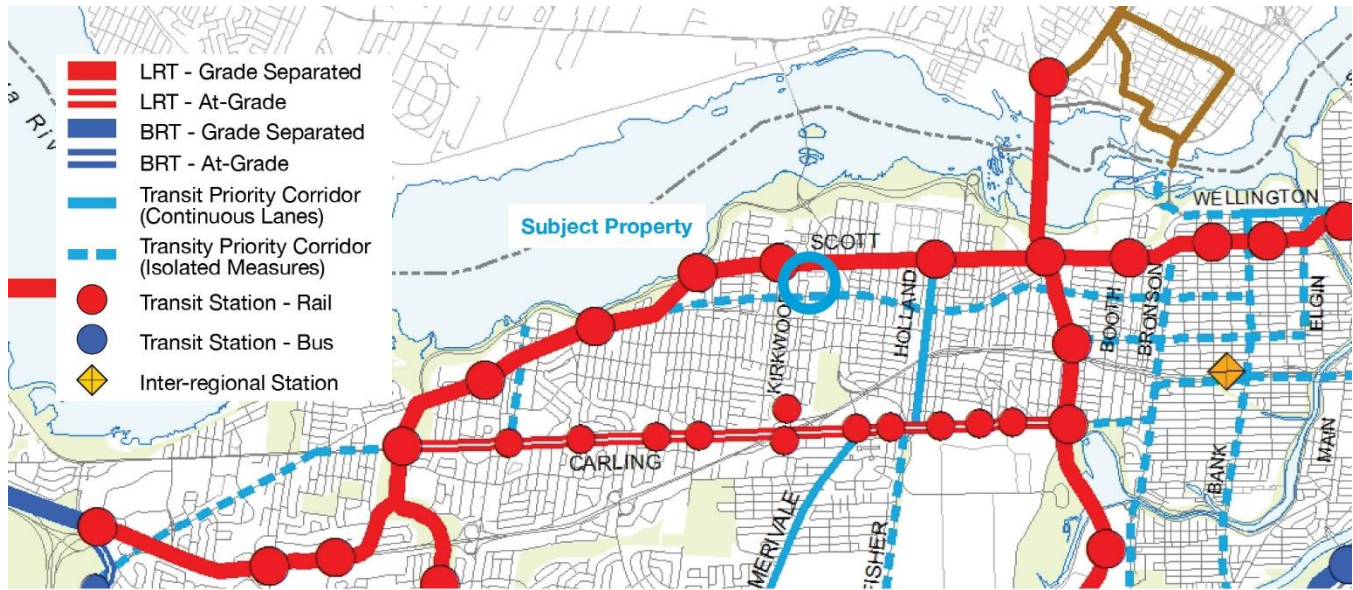


Figure 4: Planned Higher Order Transit (extract from Schedule D to the Official Plan)

- / A frequent bus route with 15-minute service, OC Transpo Route 11, runs along Richmond Road;
- / Roosevelt Avenue is a low-stress route for cycling, per analysis conducted by Bike Ottawa, and connects directly to protected multi-use paths along the Transitway, which provide east-west connections to the rest of the city;
- / While the Transitway is a barrier to north-south movement, a pedestrian connection at the end of Roosevelt offers access to the neighbourhood to the north, including a pathway system flanking the Transitway;
- / The Byron Avenue cycle corridor begins approximately 400 metres southeast of the subject property, also providing safe cycling connections to the east;
- / Multi-use pathways on Churchill Avenue, 400 metres west of the subject property, offer safe connections south;
- / Federally-owned pathways along the Ottawa River are appropriate for recreational cycling, jogging and walking as well as commute journeys, as shown in Figure 5;



Figure 5: Planned Cycling Network (extract from Schedule C to the Official Plan)

- / A robust sidewalk network is available throughout Westboro;
- / Sidewalks along Richmond Road are three or more metres wide;
- / As shown in Figure 6, Richmond Road is a designated Arterial Road, intended to carry the largest volumes of traffic over the longest distances; and
- / Richmond Road has a two-lane cross-section in the vicinity of the subject property, with parking lanes in both directions, with a total ROW width of approximately 19.5 metres.

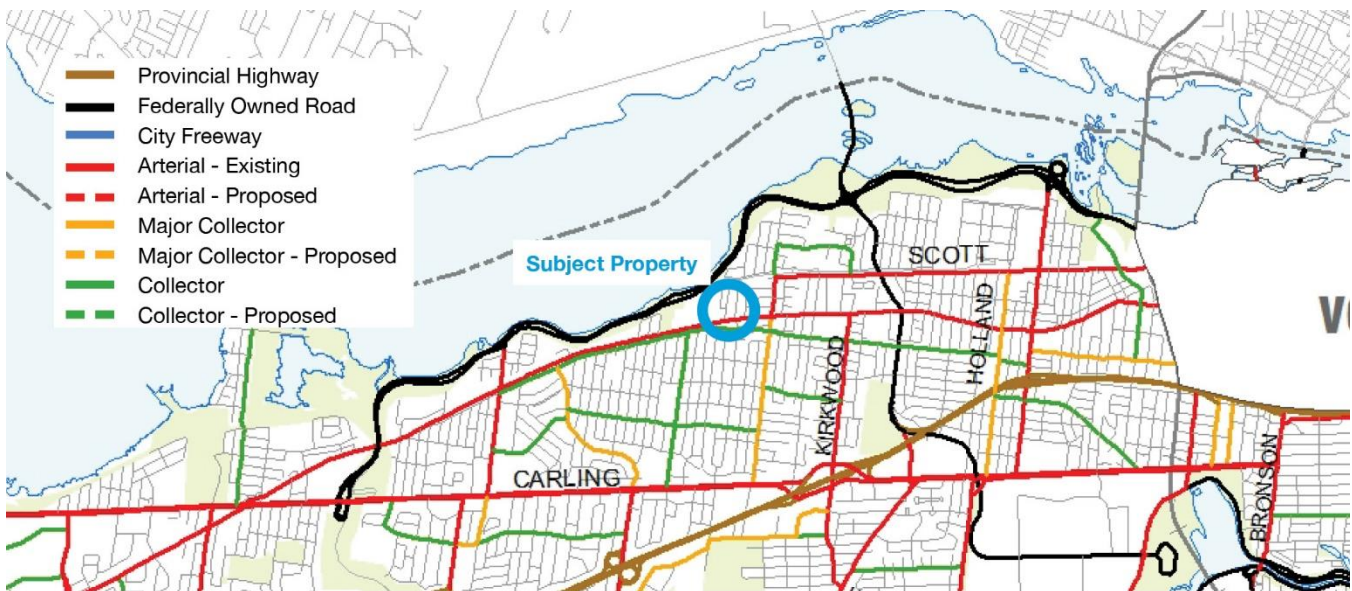


Figure 6: Road Network (extract from Schedule E to the Official Plan)

Development Principles

A set of development principles has been prepared to help determine a development concept for the site. The objective of these principles is to provide a framework for design that is responsive to and advances key development objectives as expressed through the City's planning policy documents. The principles also respond to the unique characteristics/opportunities presented by the site and its context, both at a city scale and neighborhood scale. Based on these considerations, the following series of development principles were developed:

City Context

- / Support the City's objectives for increasing the percentage of growth through intensification by developing within a key designated growth area along a designated mainstreet within walking distance to a transitway station.
- / Develop as a sustainable mixed-use project to advance the city's broad objectives of supporting increased use of sustainable transportation modes by adding increased density around LRT stations.
- / Develop to provide for viable residential accommodation with a range of apartment dwelling types.

Neighborhood Context

- / Develop to compliment the gateway character of the western approach to Westboro Village.
- / Develop to integrate with the commercial mainstreet along Richmond Road and the residential fabric along Roosevelt.
- / Develop at a scale and density that is consistent with the planned function for both mainstreets and for sites in walking distance to transitway stations.
- / Develop to advance the City's objectives to ensure economic activity including a vibrant retail environment and increased population growth to support continued vitality for the Richmond Road traditional mainstreet.

Site Development/Urban Design

- / Design the building as a contributing element to the dynamic node created by a mix of high and medium profile development flanking the Richmond Road traditional mainstreet.
- / Design to high quality architectural and public realm standards that reflect the cadence of the commercial and residential fabric in the area.
- / Provide for a unique public open space feature to enhance the public realm.
- / Design with continuous at grade commercial (retail, personal services, restaurants, and similar uses) along Richmond Road and ground oriented street related residential and/or some limited less-intense commercial opportunities along Roosevelt Avenue.
- / Design to maximize soft landscaping and provision of street trees along Roosevelt to enhance/integrate with the street's residential character.

Proposed Development

The proposed development is a nine-storey mixed-use building with 170 residential units and 583 square metres of commercial space facing Richmond Road and the corner with an amenity room penthouse. Five at-grade residential units front onto Roosevelt Avenue.

Due to site constraints, the proposed building footprint is narrow, with the majority of the building mass located towards Richmond Road. At grade- the site plan has been shaped by the need to provide an active, pedestrian-oriented mainstreet experience along Richmond Road, while transitioning to a quieter residential context towards the north. The design intent is to provide a transition in use along Roosevelt Avenue with street-accessed residential units. The building massing likewise aims to frame Richmond Road while providing built form transition, through building articulation and step backs to the existing low-rise neighbourhood.

Access to underground parking is provided off Roosevelt Avenue, through a cut-out in the ground floor. The building is set back 1.2 metres from the Richmond frontage, and along the east elevation no interior side yard setback is provided for approximately the first 25 metres from the street, where the subject property abuts another commercial property. Thereafter, the building is set back 6.6 metres from the interior side lot line, providing space for access to the underground parking and mitigating the impact of the additional height on the neighbouring residential properties. A 7.5 metre rear yard setback is proposed.

In order to frame Richmond Road, while ensuring the scale of the building is friendly to pedestrians, the building steps back from the front and corner side yard facades after four storeys. To the rear, the building respects a 45 degree angular plane, beginning at a height of 14.5 metres, 7.5 metres from the rear property line, as shown in Figure 7.



Figure 7: West Elevation Illustrating 45 Degree Angular Plane Transition to Residential Neighbourhood

Communal amenity area will be provided at-grade in the interior yard and indoors, via outdoor terraces on the second, fifth and eighth floor, and on the rooftop with a penthouse amenity room also proposed. The GFA of the penthouse amenity area is approximately 360 square metres and includes a party room and a gym. The combined mechanical penthouse/amenity area is set back 12.1 metres from the front façade and 7.8 metres from the rear façade of the ninth storey thereby minimizing any potential impacts as viewed from street-level.

The site plan includes a privately-owned public space (POPS) at the corner of Richmond Road and Roosevelt Avenue. The preliminary site plan also allows for the protection of four of the mature trees along Roosevelt.

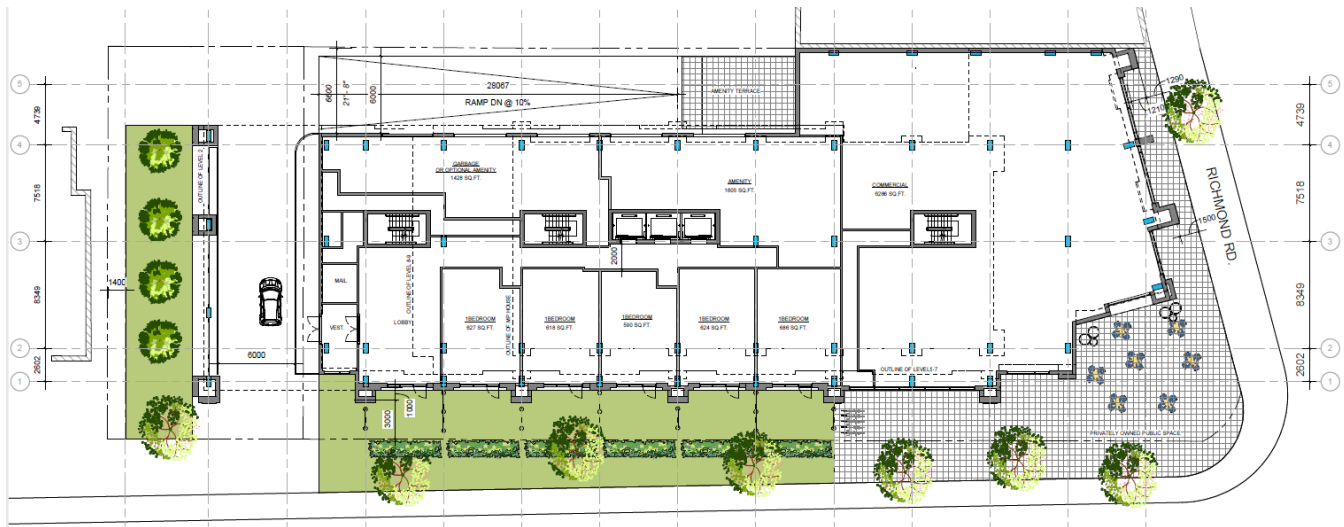


Figure 8: Extract from Concept Site Plan

Parking is provided entirely below-grade, with the access from Roosevelt Avenue as shown in Figure 8. A total of 115 vehicular parking spaces are proposed.

5.0

Policy and Regulatory Context

5.1 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 is 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. 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 options for public transit and active transportation modes.

Policy 1.7.1 states that planning authorities shall support long-term economic prosperity by maintaining and enhancing the vitality and viability for Mainstreets.

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 requested Official Plan Amendment and Zoning By-law Amendment are consistent with the PPS 2020, allowing for a proposed development to support the evolution of healthy, liveable and safe

communities. The proposed development represents significant residential intensification in a location where infrastructure, including existing and planned transit, exists to support it. The proposed development will contribute to an efficient land-use pattern that minimizes the use of resources and enhances the vitality of a mainstreet, while also contributing to the residential character of Roosevelt Avenue.

5.2 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 for 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 2031. 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 proposed development will encourage active modes of transportation and transit use. Added residential units will support existing commercial uses along Richmond Road, while the proposed commercial units will reinforce the mainstreet character of Richmond Road, contributing to a mixed-use neighbourhood. Good built-form transition, as well as ground-oriented residential uses helps to maintain the attractive character of the neighbourhood to the north.

5.2.1 Managing Growth

The Official Plan promotes efficient land-use patterns through intensification of locations strategically aligned with the transportation network and specifically along 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”. Traditional Mainstreets like Richmond Road are defined as ‘Target Areas’ for intensification in Policy 3 of Section 2.2.2 of the Official Plan.

The Residential Lands Strategy (2008-2031), which is referenced in Section 2.2.2 of the Official Plan, identifies significant intensification potential on Mainstreets. As of mid-2008, it was anticipated that 20,452 units could be achieved through intensification on Traditional Mainstreets. While this was considered to be long term potential, extending far beyond current planning horizons, Richmond Road was considered to be a likely location for significant intensification in the shorter term, due to the many desirable characteristics of the neighbourhood. Indeed, development since 2007 has added several mid-rise buildings to Richmond Road in the Westboro area.

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 a Traditional 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 between five and nine storeys inclusive are classified as mid-rise.

The proposed development is located on the Richmond Road Traditional 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 mid-rise built form. The proposed development’s response to Section 2.5.1 and 4.11 is discussed below.

5.2.2 Land Use Designation

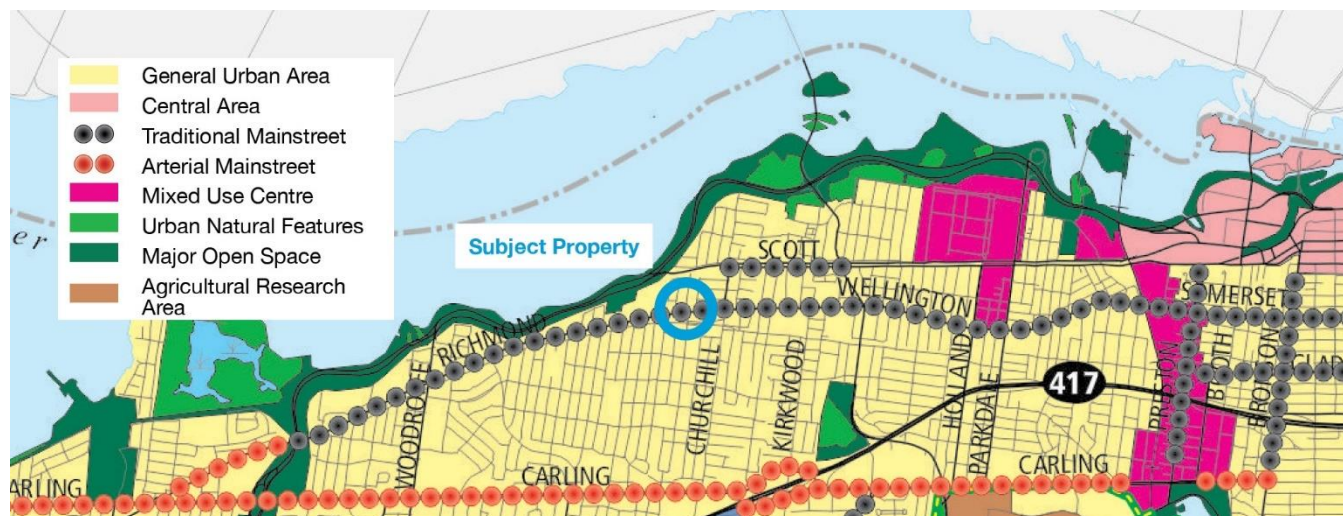


Figure 9: Official Plan Designations (extract from Schedule B to the Official Plan)

The subject property is designated Traditional Mainstreet on Schedule B to the Official Plan, as shown in Figure 9. The designation is a stand-alone designation that is intended to apply to the entire lot, to a maximum depth of 200 metres in most cases. Per Policy 4 of Section 3.6.3, development on the rear portion of the lot will not be considered non-conforming by virtue of not being located adjacent to the street.

Traditional Mainstreets were generally developed pre-1945 and have a tightly-knit urban fabric, with narrow retail frontages set close to the street. The intent of the Mainstreet designation is to encourage more dense and mixed-use development that supports and is supported by increased walking, cycling and transit use.

Intensification is most likely to occur through redevelopment of under-utilized sites, including strip malls and parking lots. Traditional Mainstreets are planned as compact, mixed-use, pedestrian-oriented streets that provide for access by foot, cycle, transit and automobile. To facilitate this, a broad range of uses is permitted on Traditional Mainstreets and redevelopment and infill are encouraged in a building form that encloses and defines the street edge with active uses. Retail and service commercial uses, offices, residential and institutional uses are all permitted on Mainstreets. However, automobile-oriented uses, such as new drive-throughs and gas bars, are not permitted on Traditional Mainstreets in most circumstances.

Buildings on Traditional Mainstreets must provide a two-storey built form, to be enforced by the zoning by-law. Taller buildings, up to mid-rise building heights of between five and nine storeys, are supported on Traditional Mainstreets per policy 11 of the Official Plan. However, as in the case of Richmond Road, secondary plans may identify different building heights.

The requested Amendment to the Richmond Road/Westboro Secondary Plan and Zoning By-law Amendment will facilitate the redevelopment of an under-utilized site with significant surface parking into a high-density, mixed-use project that supports the planning objectives for Mainstreets. Active uses and high residential densities will support the existing mix of uses on Richmond Road while continuing to encourage transit use and active modes. The proposed nine-storey height with a penthouse amenity room is generally in keeping with the heights considered appropriate for Traditional Mainstreets as well as the surrounding context, and while the Richmond Road/Westboro Secondary Plan provides more specific general building height policies it also allows for consideration for buildings with greater heights.

The proposed mechanical/amenity penthouse is set well back from the front and rear facades, mitigating impact on the streetscape. Because the floorplate of this structure is significantly smaller than the floorplate of the ninth floor, the projection is required to accommodate a mechanical

penthouse, and because the interior amenity area will support the functioning of the rooftop terraces, it is appropriate to consider this as a projection, rather than a floor.

5.2.3 Urban Design and Compatibility

High-quality urban design is critical for all aspects of development on the subject property, given its location within a Design Priority Area. Significant new development along Richmond Road represents a high-quality of design that has enhanced the aesthetic quality and functioning of the Richmond Road Traditional Mainstreet.

Two sections of the Official Plan provide design guidance on achieving high-quality urban design and compatibility with the existing and planned built context. Section 2.5.1 of the Official Plan sets out seven high-level design objectives which are broadly applicable on a city-wide basis. Section 4.11 of the Official Plan sets more specific criteria for certain classes of development.

Designing Ottawa (Section 2.5.1)

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’ among those functions that surround it.

This Planning Rationale, particularly the following sections, address the requirement for a Design Brief. The proposed development responds to the identified Design Objectives in the following way:

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

The ground floor commercial uses in the proposed development, as well as the corner POPS, respects and enhances the pedestrian-friendly mainstreet character of Richmond Road, while the additional residential density maintains and supports the existing businesses and character of the corridor. The residential units with street-facing accesses, located along Roosevelt Avenue, reinforces the residential character of the neighbourhood to the north.

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

The proposed built form, with a setback at the fifth storey, helps to frame the mainstreet. The more generous corner side yard setback allows for landscaping, reflecting and transitioning to a lower-scale residential neighbourhood. As shown in Figure 10, a POPS allows for public amenity and street life along a busy pedestrian corridor.



Figure 10: Proposed POPS animating the corner of Richmond Road and Roosevelt Avenue

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

A single driveway and 100% below-grade parking are proposed, minimizing pedestrian-vehicle conflicts and the impacts of surface parking on the adjacent community. The proposed development will maintain the sidewalk and create an enhanced pedestrian environment. The added residential units, particularly the street-facing units, will add “eyes on the street”, contributing to community safety.

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

Richmond Road is planned for mid-rise development. The height of the proposed development reflects the height of nearby recent developments. Like most of these new developments, the stepback after the fourth floor helps to respect the lower-scale character of older development along the street.

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.

Westboro is one of the most desirable communities in Ottawa. The proposed development will allow more people to choose to live in a neighbourhood where they can meet the majority of their weekly needs within a 15-minute walk.

6. To understand and respect natural processes and features in development design.

The proposed development design allows for the protection of existing mature trees in the public right of way, which confer significant local environmental benefits, including shade and heat island management.

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. While some of the policies of Section 4.11 are best addressed through the Site Plan Control process, the proposed development responds to the applicable policies in the following ways:

	Policy	Proposed Development
Views		
	The proposed development triggers no view policies	
Building Design		
5.	Design the parts of the structure adjacent to existing buildings and facing the public realm to achieve compatibility through a range of design features, including setbacks, heights and transition.	The portion of the façade facing the public realm will be articulated with architectural columns. Setbacks above the fourth floor help to create compatibility with nearby development along Richmond Road.
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 façade is oriented to the mainstreet and uses architectural columns to articulate the front façade and emphasize the entrances.
8.	Servicing and other required equipment should be internalized into the building where possible.	Servicing is proposed to be internalized and away from public view.
Massing and Scale		
10.	Developments will respond to specific design criteria set out in a Secondary Plan or Community Design Plan	Secondary Plan specific criteria are addressed below.
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.	<p>Per the shadow study prepared by RLA Architecture, the proposed development will not cast shadow on Richmond Road, and will only cast shadow on Roosevelt Street in the early morning. Afternoon shadows cast on the properties to the east will be mitigated by the building’s step-backs.</p> <p>Per the wind study prepared by Gradient Wind, wind comfort at-grade pedestrian sensitive locations across the subject site are expected to be suitable for the anticipated uses without the need for mitigation on a seasonal level. The introduction of the subject site is not expected to significantly influence pedestrian wind comfort at neighbouring areas beyond the development site.</p>
12.	Transition refers to the integration of buildings that have greater height or massing than their surroundings. Proposals for developments that are taller than the existing or planned context should demonstrate an effective transition in massing.	Consistent with the zoning provisions for the Traditional Mainstreet zone, building transition is achieved through a 45 degree angular plane applied to the rear of the building, where it transitions to a low-rise context. A six-metre setback is provided along the 30 metres of interior side yard that abuts low-rise residential uses.
13.	Building height and massing transitions will be accomplished through a variety of means, including: a. Incremental changes in building height;	Two-metre stepbacks are incorporated at the fifth floor along the street-facing facades, to provide a pedestrian-friendly scale that is compatible with other recent mid-rise development along Richmond Road.

	b. Massing; for example incorporating podiums along a Mainstreet); and c. Building setbacks and step-backs.	As noted above, more significant setbacks are provided on the rear façade.
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).	An interior side yard setback twice the minimum required by the zoning has been provided for the portion of the interior side lot line abutting residential-zoned properties, to minimize impacts on private rear-yard amenity spaces.
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.	Ample amenity space in the form of private balconies, rooftop terraces and interior rooms will serve the future residents of the proposed development.
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 development has undergone informal review at the Urban Design Review Panel. Based on comments from the panel, the following changes to the design have been implemented: <ul style="list-style-type: none"> / Additional setbacks at the rear of the building to achieve a 45 degree angular plane / Additional architectural articulation / An enhanced corner feature and POPs / An enhanced streetscape treatment along Roosevelt Avenue
24.	The massing and scale of development will define public spaces (e.g. streets).	The massing of the building helps to frame Richmond Road.

The proposed design responds to the compatibility policies set out in Section 2.5.1 and Section 4.11 of the Official Plan.

5.3 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/Fall 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 residential intensification, and contributes to a land use pattern that is consistent with significant emissions reductions.

5.4 Richmond Road/Westboro Secondary Plan

The Richmond Road/Westboro Secondary Plan, approved in 2008 provides a framework for neighbourhood change and development. Over a 20-year timeline, the Secondary Plan sets out to ensure the area develops in a way that is pedestrian and cyclist friendly, to preserve the scale and character of existing neighbourhoods and ensure the compatibility of new development. The Secondary Plan also aims to preserve and increase public greenspace and recreational facilities.

The Secondary Plan divides Westboro into several sectors. The subject property is located in the Westboro Village Sector. Of core relevance to the proposed development, the first objective of the Secondary Plan is to encourage intensification at a human scale that is compatible with the existing community on appropriate key potential redevelopment sites. In service of this goal, the Secondary Plan identifies key principles including:

- / Preserve the scale and character of established residential neighbourhoods and minimize any adverse impacts of intensification;
- / Preserve and enhance the human scale (generally four to six storeys) of the Westboro Village traditional mainstreet, Richmond Road; and
- / Achieve compatible infill/intensification on key redevelopment sites.

The Secondary Plan provides further guidance on how to achieve compatible intensification. The proposed development responds to these guidelines by:

- / Providing appropriate setbacks and transition in building heights, including lower heights along the edges of existing low-rise residential areas,
- / Conforming to the Richmond Road/Westboro CDP design guidelines as discussed below;
- / Respecting a transition in building scale and density and compatibility of land use from Richmond Road to the Ottawa River Parkway in a north-south direction, by providing a good built form transition to abutting residential uses; and
- / Avoiding creating a wall of buildings by using variations in building height, building setback and alignment to add interest to the streetscape and to provide space for activities along the sidewalk.



Figure 11: View from Roosevelt Avenue illustrating built form transition

Within Westboro Village, intensification is supported to improve storefront facades, provided that mixed use buildings that reinforce a sense of human scale are developed. While one way to achieve a human scale is buildings in the four to six storey height range, heights of seven to nine storeys are considered appropriate where block sizes and the street network help to minimize impacts on nearby low-rise residential neighbourhoods. Under these circumstances, buildings in the seven to nine storey range are permitted. Schedule C2 identifies building heights based on these criteria. As shown in Figure 12, a height of six storeys is identified for the subject property.



Figure 12: Extract from Schedule C2 to the Secondary Plan, designating maximum building heights

The Secondary Plan states that heights greater than six storeys will be considered under any of several circumstances. Specifically, buildings higher than six storeys will be limited to sites that are compatible with adjacent uses, such as the Ottawa River Parkway open space, have deeper lots, or have other natural or

manmade separations enabling impacts associated with such development to be mitigated and where lesser heights abutting existing lower rise buildings can be provided. In the case of the proposed development, the subject property is an extremely deep lot of approximately 75 metres. This lot depth is very unusual for a Traditional Mainstreet and represents an excellent opportunity to mitigate impacts through setbacks and stepbacks to the north.

The proposed building height conforms to prevailing building heights for new development, in the range of eight to nine storeys, which generally are separated from low-rise neighbourhoods by other features but are located on much shallower lots. Additionally, in response to the Secondary Plan criteria for evaluating greater height, the proposal creates a community focus on a corner lot, through the provision of a POPS. The policies for the Westboro Village Sector state that

As discussed above, Sections 4.11 and 2.5.1 of the Official Plan indicate that height in the range of nine storeys can be compatible with the surrounding desirable existing and planned context along Richmond Road, and towards the neighbourhood to the north.

Per Policy 5.2.2 of Volume 1 of the Official Plan, when considering amendments to the Official Plan, including a Secondary Plan, the City must consider the impact of the proposed change on the achievement of the policies expressed in this Plan, the effect of the proposed change on neighbouring communities, and the effect of the proposed change on the need for water, wastewater and transportation services.

While the building height does not conform to the heights identified in Schedule C2 to the Secondary Plan, per the criteria of the Secondary Plan, the subject property is an appropriate location to accommodate greater height, given the depth of the lot, which at approximately 75 metres is significantly deeper than the majority of lots that accommodate taller mid-rise buildings in the Westboro Village Sector. The size and depth of the subject property allows for a design that introduces strategic stepbacks to help mitigate shadowing, overlook and aesthetic impacts on nearby low-profile areas.

Also, the proposed development (as identified in the development principles set out in section 3.0, can contribute to the Gateway characteristics that have evolved for the western sector of the Westboro Village area. The requested height reflects the higher profile development that has occurred and which is permitted under the Secondary Plan for lands to the south and to the east.

5.5 Richmond Road/Westboro Community Design Plan

The development of the Richmond Road/Westboro Community Design Plan (CDP), which was finalized in 2007, informed the Secondary Plan. Additionally, the CDP contains more detailed design guidelines for the Westboro Village Sector, which are to be considered when evaluating proposed development. Consideration of these criteria is particularly important where increases to the permitted building height are being considered.

Section 6.6 of the CDP, the Land Use Strategy for the Westboro Village, notes that the existing as-of-right height limit on Richmond Road is eight storeys. Despite this, the CDP proposes a reduction of four to six storeys. The rationale for this reduction in permitted height is that other similar Mainstreets in the City, such as Beechwood Avenue and Bank Street in the Glebe and Old Ottawa South, have a four to six storey height limit, and that lot depths are too narrow to allow for adequate transition, including achieving the 45 degree angular plane.

To further guide the built form and massing of infill development, Section 8.2 of the CDP contains guidelines for the Westboro Village Area. The proposed development responds to these guidelines in the following ways:

- / Creates a strong edge on the street by aligning buildings on the front property line;
- / Maintains a ground-level orientation of buildings, and a direct relation to the sidewalk;

- / At the street corner, creates a variation in the building alignment by increasing the setback in order to provide a semi-public amenity area;
- / Maintains the regular rhythm of individual storefronts due to its relatively narrow frontage;
- / Relates the proportions of new construction to those of neighbouring buildings, including the facing four-storey building and nearby mid-rise buildings;
- / Minimizes space between buildings along Richmond Road by providing a 0 metre setback;
- / Steps back the additional storeys above the fourth floor, rather than the third floor as recommended in the CDP;
- / Does not locate a taller buildings to highlight a major intersection (such as Golden, Churchill, Athlone, Tweedsmuir and Kirkwood), but is located on a lot that is significantly deeper than the majority of lots along Richmond Road, including those that accommodate mid-rise buildings;
- / Continues the level of architectural detailing on both the front and corner side facades of the building;
- / Ensures existing dwellings to the north of Richmond retain adequate sunlight and privacy and minimizes overlook through a strict 45 degree angular plane and interior side yard setbacks.

Additionally, Section 8.5 of the CDP encourages the conversion of existing non-Traditional Mainstreet related uses to more Traditional Mainstreet types.

While the proposed development exceeds the maximum heights suggested in the CDP, the building and site plan respond closely to the design guidelines set out for the Westboro Village. Greater height is appropriate on the subject property, due to greater site depth and strategic building step backs and architectural articulation. Additionally, since the publication of the CDP, Council-approved directions to increase intensification have become stronger, and taller mid-rise development along Richmond Road and other Traditional Mainstreets across the City has demonstrated that eight and nine storey buildings can reflect and enhance the character and functioning of Traditional Mainstreets.

5.6 Urban Design Guidelines for Development along Traditional Mainstreets

The Urban Design Guidelines for Development along Traditional Mainstreets were approved by Council in 2006 to promote development that will enhance the recognized and planned character of Mainstreets, to achieve high-quality built form along Traditional Mainstreets, and to accommodate a broad range of uses that enables people to shop, live and access amenities. The guidelines are intended to be applied across the City within Traditional Mainstreet designations, with consideration for site-specific context and conditions.

The proposed development responds to the relevant guidelines by:

- / Aligning the front wall of the building with the adjacent building to create a visually continuous streetscape (Guideline 1);
- / Providing a front façade with variations in building setback and alignment to add interest to the streetscape, and to provide space for activities adjacent to the sidewalk (Guideline 4);
- / Creating an attractive public outdoor amenity space at the corner in the form of an outdoor cafés/plaza (Guideline 6);
- / Designing a quality building that is rich in architectural detail and respects the rhythm and pattern of the existing mid-rise buildings on the street, which generally have a setback above the third or fourth storey (Guideline 8);
- / Locating active pedestrian-oriented uses at-grade and using clear windows and doors on the façade facing the street so as to be highly transparent, and (Guideline 11);
- / Setting back the fifth to ninth floor, and the mechanical/amenity penthouse farther back from the street to help achieve a human scale and to allow more light on the sidewalks (Guideline 12);
- / Locating residential units above the level of vehicular traffic in a mixed-use building and providing shared entrances to residential units from the street (Guideline 13);
- / Locating vehicular access off the side streets (Guideline 23); and

- / Protecting mature trees adjacent to the site by minimizing grade changes (Guideline 29).

The proposed development responds closely to the Urban Design Guidelines for Development along Traditional Mainstreets

5.7 Transit-Oriented Development Guidelines

Council approved Transit-Oriented Development Guidelines in 2007 to provide guidance to assess, promote and achieve transit-supportive development within walking distance of rapid transit infrastructure. The proposed development has been designed to respond to the following relevant design guidelines:

- / Provides high residential densities – a transit-supportive land use – within 600 metres of Dominion Station (Guideline 1);
- / Creates a multi-purpose destination for transit users and local residents by providing retail amenities in concert with residential uses (Guideline 3);
- / Steps back the floors above the fourth storey to maintain a more human scale along the sidewalk to reduce shadow and wind impacts on the public street (Guideline 11);
- / Sets the building back from the public right of way, with a varied setback of between 2.5 metres and 11 metres at the corner, to define the street edge and to provide space for pedestrian activities and landscaping (Guideline 13);
- / Ground floor has been designed to be appealing to pedestrians, with such uses as retail, personal service, restaurants, outdoor cafes, and residences (Guideline 28);
- / Provides underground parking instead of surface parking (Guideline 39); and
- / Provides quality pedestrian amenities (Guidelines 48 and 49).

The proposed development contributes to the transit supportive mix of uses within 600 metres of Dominion Station. The building design and uses support a vibrant pedestrian environment as directed by the Transit-Oriented Development Guidelines.

5.8 Comprehensive Zoning By-law 2008-250

Two zones apply to the subject property. The majority of the property is zoned Traditional Mainstreet (TM), while the rear of the property is zoned Residential Third Density, Subzone S (R3S). As the property municipally known as 389 Roosevelt Avenue is intended to be developed contiguously with the property municipally known as 403 Richmond Road, in accordance with Policy 4 of Section 3.6.3, the enclosed zoning amendment will request to rezone the entire property to Traditional Mainstreet, with a special exception zone (TM[XXX1]).

The intent of the Traditional Mainstreet zone is to accommodate a broad range of uses and foster and promote compact, mixed-use pedestrian-oriented development, while imposing development standards that maintain street continuity and compatibility with surrounding land uses.

Residential and a wide range of commercial uses are permitted in a mixed-use building.

Once the entire property is zoned TM, the following performance standards will apply to the proposed development:

Zoning Mechanism	Zoning Provision	Provided	
Uses	Residential and office uses prohibited within six m. of front wall of building	At-grade residential uses about the corner side wall only	✓

Minimum Lot Area	No minimum	2,589.8 m ²	✓
Minimum Lot Width	No minimum	27.8 m	✓
Front Yard Setback	Maximum 2 m, up to a height of the lessor of 4 storeys or 15 m	1.3 m	✓
Corner Side Yard Setback	Minimum: 3 m	3 m	✓
Interior Side Yard Setback	Maximum: 3 m, except where: Abutting R-zone: min. 3 m	Abutting TM: 0 m Abutting R3S: 6.6 m	✓
Minimum Rear Yard Setback	7.5 m	7.5 m	✓
Front Facade	50% of ground floor façade facing main street, up to 4.5 m, must be transparent windows and active entrances Wall Area along Richmond Rd.: 88 m ²	56.27 m ²	✓
Active Entrances	Front façade must include at least one active entrance serving each use occupying the ground floor	Included	✓
Building Height	Minimum: 6.7 m Maximum: 20 m	30 m + 4.5 m amenity penthouse	✗
Front Yard Stepbacks	Above the lessor of 4 storeys/ 15 m, the building must be set back 2 m from provided setback	2 m	✓
45° Rear-yard angular plane	No part of the building may project above a 45° angular plane measured at a height of 15 metres from a point 7.5 metres from the rear lot line	Complies	✓
Maximum FSI	No maximum	N/A	✓
Minimum Landscaped Area	Abutting R-zone: 3 m buffer	7.5 m landscaped buffer	✓
Amenity Area Requirements	6 m ² per unit, and 50% communal One area min 54 m ² 170 units = 1,020 m ² (total) Communal = 510 m ²	Total Communal Amenity Area (interior and exterior) 1,109 m ²	✓
Permitted projections above height limit	Landscaped Areas Mechanical/Service Penthouse	Landscaped Terrace, Mechanical Penthouse,	✗

		Amenity (329 m ²) + Bath rooms	
Access	Driveway: 6 m (double-lane) Aisle: 6.7 m	Driveway: 6 m Aisle: 6 m	✓
Maximum Parking	1.5/unit: 255	115 spaces	✓
Minimum Parking Spaces (Area Y)	Retail – 2.5/100 m ² after first 500 m ² – 583 m ² /100)*2.5 = 2 Residential: 0.5/unit after first 12 units: (170-12)*5 = 79 Visitor: 0.1/unit after first 12 units – (170-12)*0.1 = 16 Total: 97 10% reduction for 100% of spaces below-grade	115 spaces	✓
Bicycle Parking Spaces	0.5/unit: 170*0.5 = 85 Commercial retail 1/250 m ²	85 spaces Commercial retail: 2 spaces	✓
Bicycle Path	1.5m	1.1m	✗
Loading Spaces	0 required	0 provided	✓

A major zoning by-law amendment is required to rezone a portion of the subject property to the appropriate TM zone. The proposed development will comply with the vast majority of the TM zone provisions, with the exception of maximum height, the required width for a bicycle path and permitted projections. In particular, the proposed development respects all setbacks requirements as well as the 45 degree angular plane, ensuring compatibility with adjacent development.

Whereas the parent TM zone permits a maximum height of 20 metres, a site-specific exception is proposed to permit a height of 30 metres. The request to increase the maximum building height is consistent with the policies of the Traditional Mainstreet designation as well as the surrounding context and built form.

Section 111 (Bicycle Parking) outlines the requirements for bicycle parking and includes a provision (9) that necessitates a 1.5m wide path for the bicycle storage area. A small section of the garage includes a pinch point that is approximately 1.1m in width, thus requiring a variance to the By-law. The average width of a bicycle ranges from 15 to 24 inches (38 - 61cm). As a result, the proposed width of 1.1m is sufficient to provide unconstrained access to and from the bicycle raking system located within the garage. As such, the proposal to reduce the width of the bicycle path is appropriate and suitable for the function of the building.

Additionally, a site-specific exception is requested to permit a 330 square metre amenity area as part of a permitted projection. This amenity area will be located within the same volume as the required mechanical room, will be set well back from the front and rear facades, and will increase the attractiveness and useability of the exterior rooftop terraces through all four seasons. A detail of the amenity room and mechanical penthouse is provided below.

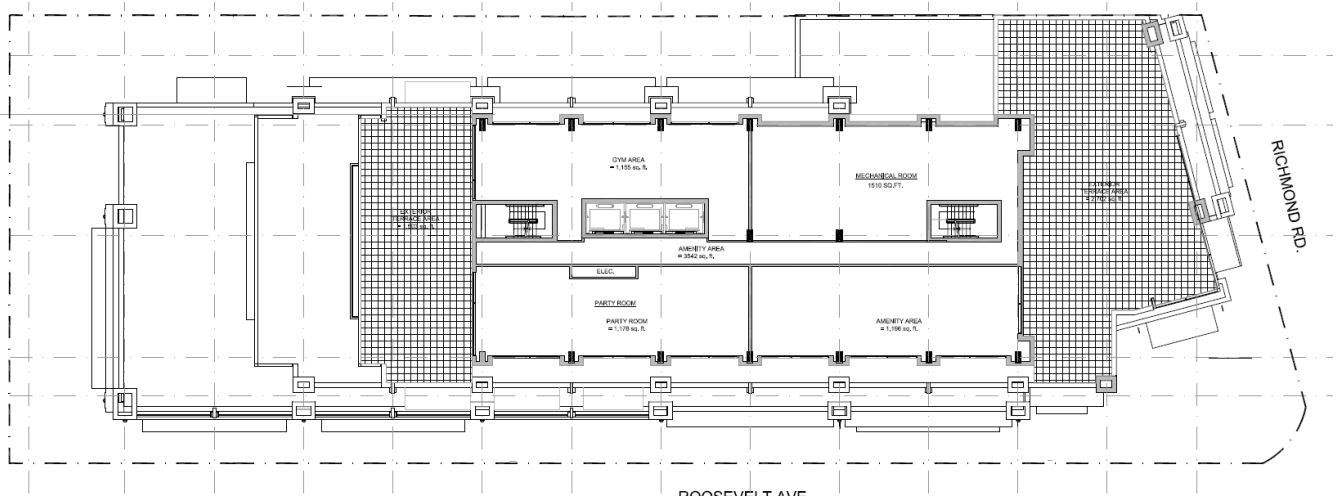


Figure 13: Amenity Room and Mechanical Penthouse

6.0

Requested Amendments

6.1 Official Plan Amendment

An Official Plan Amendment is requested to amend Schedule C2 to the Richmond Road/Westboro Secondary Plan to permit a height of nine (9) storeys on the subject property.

The requested Official Plan Amendment will facilitate a development that is compatible with the existing and planned character of Richmond Road, in keeping with the objectives of the Richmond Road/Westboro Secondary Plan and the Official Plan.

6.2 Zoning By-law Amendment

It is requested to rezone the entirety of the subject property to TM[XXX1], with a Site Specific Exception to impose site-specific performance standards as follows:

- / Permit a maximum height of 29 metres; and
- / for a permitted projection above the height limit related to a rooftop amenity area:
 - (i) a maximum height of 4.5 metres is not included in the overall height of the building,
 - (ii) a maximum gross floor area of 365 square metres is permitted.

The requested zoning amendment will rezone the entire property to the appropriate implementing zone while facilitating a development that respects and enhances the character and functioning of the Richmond Road Traditional Mainstreet, and the low-rise residential community to the north.

7.0 Supporting Plans and Studies

7.1 Adequacy of Servicing

An Assessment of Adequacy of Public Services Report was prepared by CIMA+ confirming that the proposed development can be adequately serviced by the existing municipal infrastructure (water, sanitary and storm) surrounding the site.

7.2 Transportation Impact Assessment

A Transportation Impact Assessment is being prepared by CIMA+. Step 1 (Screening Form) and Step 2 (Scoping) have been submitted to the City. At the time of application submission, Step 3 (Forecasting) was being reviewed by City of Ottawa transportation engineers. CIMA+ is awaiting comments from City Staff prior to moving forward with Step 4 (Analysis). During the development review process, we expect the review and final approval of the TIA to take place concurrently to the Official Plan Amendment and Zoning By-law Amendment Applications.

7.3 Geotechnical Investigations

Paterson Group was commissioned to prepare a preliminary geotechnical investigation report based on the available subsoil and groundwater information for the proposed multi-storey building at 403 Richmond Road. The recommendations state that further testing and observation services program are required to confirm geotechnical recommendations.

7.4 Wind and Noise Assessments

Gradient Wind Engineering was retained to undertake a qualitative pedestrian level wind assessment for the proposed mixed-use development. Based on their analysis, the report provides some high-level recommendations, but notes that wind comfort at-grade pedestrian sensitive locations across the subject site are expected to be suitable for the anticipated uses without the need for mitigation on a seasonal level. The introduction of the subject site is not expected to significantly influence pedestrian wind comfort at neighbouring areas beyond the development site.

Gradient Wind Engineers were also retained to prepare a road traffic noise feasibility assessment in which the noise levels predicted due to roadway traffic exceed the criteria listed in the ENCG for building components and upgraded building components will be required. The results also noted that the development will require a central air conditioning system to allow residents to keep their windows closed and maintain a comfortable living environment. The standard City warning clauses would also be required in all lease, purchase and sale agreements.

8.0

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 may be adjusted, in consultation with the Ward Councillor and municipal staff.

As a first step, the project team arranged and attended separate meetings with the Westboro Community Association, the Westboro Beach Community Association as well as the Westboro Village BIA. At these meetings the team discussed the development principals and overall vision driving the redevelopment at 403 Richmond Road. Once preliminary architectural plans were prepared, these groups were circulated and asked to provide comments on the proposed development.

In addition to meeting with community groups, the project team identified approximately 20 residences on both Roosevelt Avenue and Winston Avenue for mail-outs. The letter invited residents to join a Zoom Meeting on May 8, 2020 to review the development principals and overall vision driving the redevelopment at 403 Richmond Road. Following this meeting, preliminary architectural plans were circulated to those residents in attendance. These residents provided additional comments on the preliminary architectural plans.

At this time, the following additional steps in the consultation strategy are proposed:

- / Email notification to Councillor Leiper's office in advance of application submission;
- / An online Public Zoom Meeting to be hosted by Councillor Leiper and his Staff, tentatively scheduled for September 9, 2020;
- / If requested by the Councillor, preparation of a short information package to be distributed virtually, including a contact address and number for Fotenn to collect community feedback;
- / Notification of neighbouring property owners and posting of public signage, to be completed by City staff; 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.

9.0 Conclusions

It is our professional opinion that the proposed Official Plan and Zoning By-law Amendments for the subject property constitute good planning and will facilitate a development that is in the public interest. As outlined in the preceding sections:

- / The proposed development represents residential intensification in a location where adequate public service infrastructure and facilities exist to support the development, consistent with the PPS 2020;
- / The proposed development will support and add to the viability and vibrancy of the Richmond Road Traditional Mainstreet, consistent with the PPS 2020;
- / The proposed development is an intensification project in a target area for intensification, helping to achieve the growth management objectives of the Official Plan, while supporting investments in rapid transit;
- / The proposed uses and built form conform to the land use designation policies for Traditional Mainstreets;
- / The requested building height, including the mechanical/amenity penthouse, conforms to the urban design policies of the Official Plan;
- / The requested amendment to the Richmond Road/Westboro Secondary Plan to permit additional height meets the criteria for considering increased height;
- / The proposed development is closely shaped by, and responds to, the applicable design guidelines including those in the Richmond Road/Westboro CDP and Urban Design Guidelines for Traditional Mainstreets;
- / The proposed development conforms with the vast majority of the provisions of the Zoning By-law, and the requested height increase complies with the intent of Zoning By-law; and
- / The proposed development is supported by technical studies submitted as part of this application.

Sincerely,