593 Laurier Avenue West

REVISED PLANNING RATIONALE

IN SUPPORT OF

SITE PLAN CONTROL AND ZONING BY-LAW AMENDMENT APPLICATIONS

Prepared by:



Novatech

Suite 200, 240 Michael Cowpland Drive Ottawa, Ontario K2M 1P6

> December 16, 2019 Revised August 11, 2020

Novatech File: 119019 Ref: R-2019-205



August 11, 2020

City of Ottawa Planning, Infrastructure and Economic Development Department 110 Laurier Avenue West Ottawa, Ontario K1P 1J1

Attention: Andrew McCreight, Planner III, Development Review Central

Dear Mr. McCreight,

Reference: Revised Planning Rationale

593 Laurier Avenue West

Site Plan Control and Zoning By-law Amendment Applications

Our File: 119019

The following revised Planning Rationale has been prepared as a requirement of the proposed Zoning By-law Amendment and Site Plan applications for the property municipally-known as 593 Laurier Avenue West. The proposal entails rezoning the Subject Site to facilitate the development of 63 units, 53 in a nine storey mid-rise residential building and six in the existing heritage asset, Alexander Fleck House. No parking for the residents and two visitor parking spaces are proposed. On the basis of first round City comments, the proposal has been significantly reduced in size from the initial application which was for a 17 storey building with 85 units. The Planning Rationale has been revised accordingly.

Based on the findings of this Planning Rationale, the proposed rezoning and site plan applications are consistent with the Provincial Policy Statement, conform to the policies of the City of Ottawa Official Plan and establish appropriate zoning standards for the Subject Site.

If you have any questions or comments regarding this proposal, please feel free to contact Murray Chown at m.chown@novatech-eng.com or the undersigned at j.ireland@novatech-eng.com eng.com.

Sincerely,

NOVATECH

James Ireland, BUPD

Project Planner – Planning & Development

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1.0 INTRODUCTION AND CONTEXT

1.1 Purpose

Novatech has prepared this revised Planning Rationale to describe the revised Zoning By-law Amendment and Site Plan Control applications required to facilitate the development of a midrise residential building at 593 Laurier Avenue West (hereafter the 'Subject Site'). The revised proposal is a nine storey mid-rise apartment building which requires the rezoning the Subject Site from Residential Fourth Density, Subzone T (R4T) to Residential Fifth Density, Subzone Q, with a site-specific exception and 30 metre height limit [R5QXXXX H(30)]. The current proposal is significantly reduced in size from the initial application which was for a 17 storey building with 85 units.

The zoning by-law amendment will also seek to modify the following provisions within the R5Q zone:

- Front yard setback;
- Interior side yard setback;
- Rear yard setback;
- Parking;
- Visitor parking;
- Location of amenity area; and
- Walkway width.

This Planning Rationale will demonstrate that the proposed development and zoning amendment are:

- Consistent with the Provincial Policy Statement;
- Conform to the City of Ottawa Official Plan and applicable Guidelines; and
- Establish appropriate zoning standards for the Subject Site.

1.2 Site Description and Location

The Subject Site is a corner lot located in the Somerset ward in the City of Ottawa on the west side of Bronson Avenue and north side of Laurier Avenue West. The site is approximately 1,400m² in area, with 29.29 metres of frontage on Laurier Avenue West and 39.9 metres of frontage on Bronson Avenue. The lands that make up the Subject Site are legally described as Part of Lot 40, Concession A (Ottawa Front) as in CR231415, CR259616 except Part 1 on N287620; in the City of Ottawa.

The Subject Site is occupied by a low-rise residential dwelling that has been designated as a heritage building under Part IV of the Heritage Act. The Site is zoned Residential Fourth Density, Subzone T (R4T) as seen in Figure 1.



Figure 1: Existing Zoning of Subject Site (GeoOttawa, as edited)

1.3 Surrounding Uses

Figure 2 displays the locations and types of surrounding land uses.

North: To the north of the Subject Site is a low-rise apartment building. The roof is generally at grade with the Alexander Fleck House. Further north will be portions of the LeBreton Flats development and the future Main Library.

East: To the east is a large open space (community garden), existing high-rise mixed-use buildings and future high-rise development as indicated by the *Escarpment Area District Plan*.

South: To the south are mid- and high-rise residential buildings, located in the Bronson Avenue Traditional Main Street designation.

West: To the west are two low-rise apartment buildings before reaching the steep decline to Slater Street along the escarpment.



Figure 2: View of the Subject Site and Surrounding Area (Google Earth, as edited)

1.4 Transportation Network

The Subject Site has frontage along Laurier Avenue West and Bronson Avenue. Bronson Avenue is identified as an Arterial road on Schedule F of the City of Ottawa Official Plan (Figure 3) and Laurier Avenue West is a local road.



Figure 3: Schedule E, Urban Road Network, Excerpt (Ottawa Official Plan, as edited)

Annex 1 – Road Classifications and Rights-of-Way states, "Arterial roads function as major public and infrastructure corridors in the urban communities and villages they traverse. They not only accommodate car and truck traffic, but also serve pedestrians, public utilities, cyclists and public transit buses."

Bronson Avenue at the Subject Site is an Arterial Road that distributes traffic between Albert and Slater Streets and the local road system. It also accommodates walking and cycling connections.

Laurier Avenue West is a Local Road. Annex 1 states, "Local roads are found within communities and distribute traffic from arterial and collector streets to individual properties, typically over short distances. Pedestrians and cyclists are major users of local roads, starting or finishing their journeys along these roads".

Laurier Avenue West will distribute local pedestrian, cycling and vehicular traffic, providing access to the Subject Site. The principal entrance to the proposed development is via the vestibule that links the Heritage building and the new building. The vestibule is accessed from Laurier Avenue West. Driveway access to the proposed visitor spaces and drop off area is also off Laurier Avenue West.

The Subject Site is located within the 600 m radii of the Pimisi and Lyon LRT Stations as seen in Figure 4. It is served by a number of bus routes along Bronson Avenue and Albert and Slater Streets. It is also well-connected to Ottawa's cycling network as seen in Figure 5.

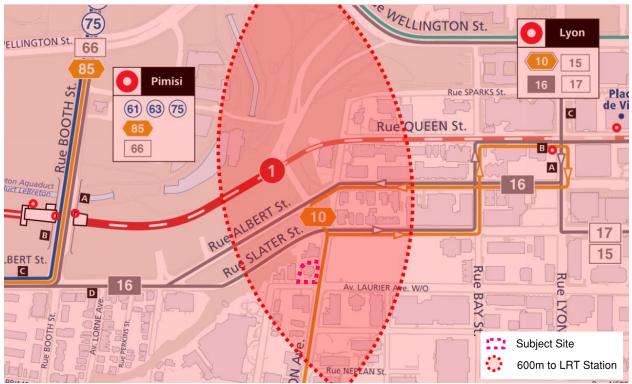
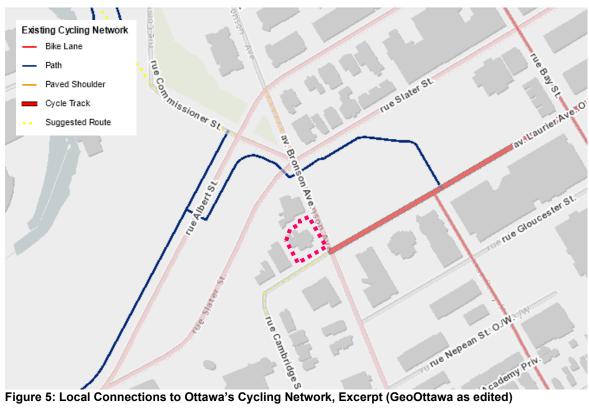


Figure 4: Proximity to Transit (OC Transpo and GeoOttawa as edited)



2.0 DEVELOPMENT PROPOSAL



Figure 6: Rendered Image of the proposal, looking north from Bronson Avenue (Project1 Studio)

The proposed development is a nine storey residential building addition to an existing designated Heritage building, the Alexander Fleck House, at 593 Laurier Avenue West. The proposed development is shown in the architectural drawings submitted with the Site Plan application. A total of 63 residential units are proposed, six in the existing building and 57 in the new building. Two visitor car parking spaces and bicycle parking above the Zoning By-law requirement are proposed. The unit mix includes studio, one- and two-bedroom units, which are proposed to be for rent. Balconies flank both ends of the addition from levels five to nine, and a terrace over Laurier Avenue West is on level four. Large amounts of glazing provides animation at street level.

Heritage

The Alexander Fleck House will accommodate six of the apartments and will be completely restored to create a lasting piece of important local heritage. The heritage asset constraints result in the proposed addition having a slim, single-loaded corridor that 'hinges' around the viewing turret - a significant characteristic of the heritage building - and allow the heritage building to maintain its prominence on site. The podium of the addition is clad to complement the heritage building. The upper levels also step back from Laurier Avenue West to provide more emphasis to the Alexander Fleck House and the low-rise podium. The entrance to the addition is no longer proposed through the Alexander Fleck House as the proposed addition has been lowered to provide a functional basement level.



Figure 7: Rendered Image of the proposal, looking south west from Slater Street (Project1 Studio)

Amenity Area

Amenity areas will be provided that amount to more than the requirements of the Zoning By-law. The proposal provides a total of $398m^2$ of amenity area, in excess of the requirement of $378m^2$. Of this, $83m^2$ is private amenity area provided by balconies (21%). A further $43m^2$ (11%) is provided within the heritage building, $132m^2$ (33%) on the roof terrace and $141m^2$ (35%) in the corner side yard.

Parking

No parking for residents is proposed given the proximity of the Subject Site to excellent transit and active transportation options. Two visitor parking spaces are proposed.

3.0 PLANNING POLICY AND REGULATORY FRAMEWORK

This section will list relevant policies from the Provincial Policy Statement, Official Plan, Community Design Plan, relevant Guidelines and the Zoning By-law. Responses to each policy are provided to show that the project is in keeping with plans for the area.

It should be noted that the Subject Site is somewhat forgotten in the City of Ottawa's planning framework. The areas surrounding the Site have strongly-identified existing and planned contexts, and although the Subject Site links these areas (e.g. Uppertown Commons with LeBreton Flats), it is not contained within any of the City's plans for the immediate area, such as the *Central Area* and *Centretown Secondary Plans* and the *Downtown Ottawa Urban Design Strategy (DOUDS)*. The *DOUDS* describes the immediate context as ideal for high- and mid--rise buildings.

The Zoning By-law also leaves the Subject Site apart from its surrounding planned and existing context. The Site is immediately adjacent to Area X on Schedule 1A of the Zoning By-law which enables no parking for tenants in mid-rise buildings.

On the other hand, the Site is captured by the *Escarpment Area District Plan* (Community Design Plan). Unfortunately, this plan provides no direction for the Subject Site despite its prominence atop the escarpment - overlooking the future LeBreton Flats and Main Library - and its position helping to frame the Uppertown Commons open space described in the Plan (across Bronson Avenue between Laurier Avenue West and Slater Street).

The application for Zoning By-law Amendment addresses two major aspects of the planned context for the Site by:

- Increasing the permitted height to be consistent with that found in the adjacent existing and planned areas; and,
- Reducing parking to an amount that is appropriate for sites within walking distance to LRT stations.



Figure 8: Schedule 1A: Near LRT Stations Area Z, Excerpt (GeoOttawa as edited)

3.1 Provincial Policy Statement

The Provincial Policy Statement (PPS) was issued under Section 3 of the Planning Act and came into effect on May 1, 2020. This section will discuss relevant policies of the PPS.

Section 1.1.1 of the PPS states that healthy, liveable and safe communities are sustained by:

- b) accommodating an appropriate affordable and market-based range and mix of <u>residential</u> types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;
- e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;

The proposed development is a high-density urban infill project in which its residents will take advantage of, and further support, existing infrastructure and services in the neighbourhood. This minimizes land consumption and servicing costs in the most efficient manner. The proposed Zoning By-law Amendment will facilitate a development that will accommodate market-based residential units (i.e. studio, one and two bedroom rental apartments).

Section 1.1.3.1 of the PPS states that, "<u>settlement areas shall be the focus of growth and development.</u>". Section 1.1.3.2 states that land use patterns within settlement areas shall be based on:

- a) densities and a mix of land uses which:
 - a) efficiently use land and resources;
 - b) are appropriate for, and <u>efficiently use</u>, the infrastructure and <u>public service</u> facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;
 - c) minimize negative impacts to air quality and climate change, and promote energy efficiency;
 - d) prepare for the impacts of a changing climate;
 - e) support active transportation;
 - f) <u>are transit-supportive</u>, where transit is planned, exists or may be developed; and
 - g) are freight-supportive.

The proposed development is within a settlement area and promotes the efficient use of land, resources, infrastructure, municipal services and public facilities. With regard to active and public transportation, the Subject Site will have access to cycling and bus routes along Laurier Avenue West, Bronson Avenue, and Albert and Slater Streets. The Pimisi and Lyon LRT station are within a 600m radius of the Subject Site.

The proposal, which supports intensification and has regard for numerous capital improvements in the immediate neighbourhood, will promote a land use pattern, density and mix of uses that efficiently utilises city resources, minimizes vehicular dependence and supports accessible active as well as public modes of transportation.

Section 2.6.1 of the PPS states, "Significant built heritage resources and significant cultural heritage landscapes shall be conserved".

The proposed development conserves, restores and complements the heritage resource. Residents will experience the heritage aspects of the Fleck house every time they view the restored building. The Fleck house will retain prominence on the street as it will continue to be used as a residential building, housing six apartments.

The proposal represents appropriate intensification and is consistent with the Provincial Policy Statement.

3.2 City of Ottawa Official Plan

The Subject Site is designated 'General Urban Area' on Schedule B of the *City of Ottawa Official Plan* (OP) as seen in Figure 9. The following policies from the *Official Plan* support the proposed development. Of focus are policies that rationalize the development of a building taller than four storeys, which is the maximum building height generally permitted within the General Urban Area designation unless otherwise described by *Official Plan* policy.

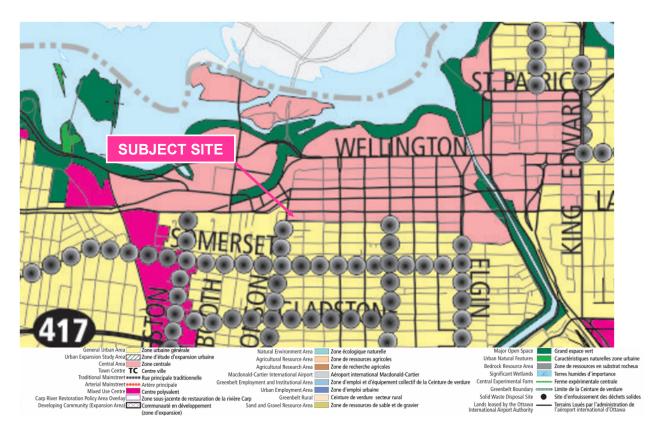


Figure 9: Schedule B, Excerpt (Ottawa Official Plan as edited)

The following policies, taken directly from the Official Plan, are shown *italicized*. Applicable portions are underlined. Novatech's responses to the policies follow in normal font.

2.2.2 Managing Intensification Within the Urban Area

The Official Plan Section 2.2 states that: "about 90 per cent of the growth in population, jobs and housing will be accommodated within areas designated within the urban boundary". It goes on to describe the promotion of intensification as a strategy to manage growth in a sustainable way and states that, "concentrating growth within the designated urban area also allows for a pattern and density of development that supports walking, cycling and transit... and supports a cleaner, safer, healthier city. This is the most cost-effective pattern for the provision of municipal services and infrastructure."

Specifically, Policy 10 states,

Intensification may occur in a variety of built forms from low-rise to high-rise provided urban design and compatibility objectives are met. Denser development, that often means taller buildings, should be located in areas that support the Rapid Transit and Transit Priority networks and in areas with a mix of uses. ...

Policy 11 goes on to state,

The distribution of appropriate building heights will be determined by:

- a. The location in a Target Area for Intensification identified in policy 4 above or by proximity to a Rapid Transit station or Transit Priority corridor, with the greatest density and tallest building heights being located closest to the station or corridor; and
- b. The Design and Compatibility of the development with the surrounding existing context and planned function, as detailed in Section 4.11, with buildings clustered with other buildings of similar height. [Amendment #150, LPAT Decision October 22, 2018]

The proposed development and rezoning support the intensification of the Subject Site, resulting in a cost-effective land use pattern for the provision of municipal services, transit and other infrastructure. The Subject Site is within a 700 metre walking distance of both Pimisi and Lyon LRT Stations in addition to a variety of bus stops. The Subject Site is within walking distance of the employment and services hub of downtown Ottawa and Chinatown, Little Italy, Centretown and LeBreton Flats.

The planned function of the area is intensively urban in that it has the oldest and highest concentration of high-rise buildings in Ottawa and is excellently-served by transit, human services, public institutions, recreation, shopping and employment opportunities. The Design and Compatibility of the development is further explored below within the context of Official Plan Section 4.11.

2.5.1 Designing Ottawa

Policy 1

In the preparation of community design plans, the review of development applications, studies, other plans and public works undertaken by the City, the Design Objectives set out above will apply, as applicable. Proponents of new development or redevelopment will also be required to demonstrate how their proposal addresses the Design Objectives. [Amendment #150, LPAT July 18, 2019]

Design Objectives

- 1. To enhance the sense of community by creating and maintaining places with their own distinct identity.
- 2. To define quality public and private spaces through development
- 3. To create places that are safe, accessible and are easy to get to, and move through.
- 4. To ensure that new development respects the character of existing areas.
- 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.
- 6. To understand and respect natural processes and features in development design.
- 7. To maximize energy-efficiency and promote sustainable design to reduce the resource consumption, energy use, and carbon footprint of the built environment.

These design objectives are considered in the submitted drawings and described throughout this combined planning rationale and design brief.

3.6.1 General Urban Area

Policy 3.

Building height in the General Urban Area will continue to be predominantly Low-Rise. Within this range, changes in building form, height and density will be evaluated based upon compatibility with the existing context and the planned function of the area. Secondary plans or zoning that currently permit building heights greater than four Storeys will remain in effect.

Policy 4.

Notwithstanding Policy 3, new taller buildings may be considered for sites that:

- front an Arterial Road on Schedules E or F of this Plan and which are:
- i. <u>within 800 metres walking distance of a Rapid Transit Station on Schedule</u>

 <u>D of this Plan, or</u>
- ii. <u>on a Transit Priority Corridor on Schedule D of this Plan.</u> For the purposes of this policy only, the "Transit Street" defined in the Riverside South Community Design Plan is considered an Arterial Road;
- 2. <u>are in an area already characterised by taller buildings or sites zoned to permit</u> taller buildings. [Amendment #150, LPAT October 22, 2018]

The Subject Site is within less than 800 metres walking distance of two LRT stations, Pimisi and Lyon. The Site is bound to the east by Bronson Avenue, which is an arterial road identified as a Transit Priority Corridor on Schedule D of the Official Plan.

The neighbourhood has the highest concentration of high-rise buildings in Ottawa. High-rise buildings can be seen abutting the east side of Bronson Avenue and proliferate in the neighbourhood east of Bronson Avenue, which are designated parts of the Central Area and Centretown Secondary Plans and zoned for high-rise. The west side of Bronson Avenue has a variety of building heights from two to 10 storeys and a 19-storey building currently under construction on the block south of the Subject Site. Lands abutting Slater and Albert Streets east and west of Bronson Avenue (including the LeBreton Flats north of the Subject Site) are proposed for high-rise development as seen in the *Escarpment Area District Plan* and publicly-available development applications (e.g. for the area north of the Subject Site that includes the library).

The Subject Site is in a unique location given that it is surrounded by, but not included in, the Bronson Avenue Traditional Main Street, the Central Area Secondary Plan and the Centretown Secondary Plan. These plans suggest building heights, which are mid- and high-rise closest to the Subject Site. The Site is included in the *Escarpment Area District Plan*, which is described in its executive summary to "establish [] a new benchmark for high-rise built form in the city". The Subject Site is likely included in this Plan because it sits atop the escarpment, is part of the

background to future LeBreton Flats developments and helps to frame the Upper Town Commons (the large park proposed east of Bronson between Slater Street and Laurier Avenue West). Buildings framing the Upper Town Commons are existing and planned high-rise buildings.

As a mid-rise building, the proposal is considered a 'taller building' in Policy 4. The subject site is consistent with all the location requirements of the policy.

4.0 Review of Development Applications

Section 4 of the Official Plan outlines policies related to the review of development applications to ensure that new development meets the objectives of the Official Plan. The following section demonstrates how the proposed redevelopment of the Subject Site conforms to the policies in Section 4.1 through 4.11 of the Official Plan.

4.1 Site-Specific Policies and Secondary Policy Plans

The Subject Site is not subject to any Site-Specific Policies or a Secondary Policy Plan in Volume 2 of the Official Plan. However, it is subject to the Escarpment District Area Plan, which is a Community Design Plan.

4.2 Adjacent to Land-Use Designations

The Subject Site is not adjacent to any areas of natural or scientific interest.

4.3 Walking, Cycling, Transit, Roads, and Parking Lots

Policy 4

The City may, in keeping with the direction in Section 2.3, establish maximum requirements for on-site parking and reduce or eliminate minimum requirements in:

- a. intensification target areas; or
- b. within 800 metres walking distance of a rapid transit station; or
- c. within 400 metres of the Transit Priority Network, inside the Greenbelt; or
- d. <u>within 400 metres of a Traditional Mainstreet, inside the Greenbelt;</u> and in particular where the small size, dimensions <u>and other characteristics of</u> existing lots preclude the ability to provide on-site parking for a change in use or

small-scale intensification. [Amendment #150, LPAT. July 29, 2019]

Policy 5

The City may reduce parking requirements for uses located within 600 metres of a rapid-transit station and for uses where the need for on-site parking can be balanced with efforts to reduce reliance on the automobile. The City may use the zoning by-law and cash-in-lieu of parking agreements as tools to reduce parking requirements. Furthermore, as referenced in Policy 44 of Section 2.3.1, the zoning by-law may establish maximum parking requirements that would apply to

development within 600 metres of a rapid transit station/service. [Amendment #76, August 04, 2010]

No resident parking spaces are proposed. The expectation is that residents will choose walking, cycling and using transit for their daily commutes as they will be in a prime location 450m west of the main commercial downtown core (taken as east of Lyon Street) and within an 800m walk of Lyon and Pimisi LRT stations. The site is within 60m of bus services on Bronson Avenue and within 250m of services on Slater and Albert Streets. There is a Communauto 'station' at 600 Laurier Avenue West, directly across the street from the subject site. This could be conveniently used by residents for occasional car use. There is a second station 160m south on Bronson and a third and fourth within 500m as back ups. It is appropriate to reduce resident parking to zero for the subject site.

Two parking spaces are proposed to accommodate visitors to the development. Five visitor parking spaces are required under the Zoning By-law. It is expected that the remaining three required visitor parking spaces can be accommodated by local on- and off-street parking or that visitors will adopt the approach of the residents and not rely on private automobiles at all.

Policy 9

The City will require that parking areas for motorized vehicles be screened from the street with low shrubs, trees, landscaped berms, decorative walls and fences.

Two parking spaces are proposed to be located where the drive aisle leading to the existing parking area is today. While no screening will be possible, the parking is somewhat less visible given its location atop a grade incline from the street, and set behind the front wall of the proposed addition. As visitor spaces, some visibility from the street is considered desirable.

4.4 Water and Wastewater Servicing

The Subject Site will be serviced by municipal water and wastewater services. A revised Development Servicing and Stormwater Management Report dated July 31, 2020 has been prepared by Novatech. The Report indicates that existing municipal water and wastewater infrastructure can accommodate the proposed development on the Subject Site. Refer to the report for further details.

4.6 Cultural Heritage Resources

A revised Cultural Heritage Impact Statement (CHIS) dated August 10, 2020 has been prepared by Robertson Martin Architects (RMA), given the Heritage designation of the Alexander Fleck House.

The CHIS concludes:

Through the application of materials, massing, form, 'datum line' and 'gasket' connection with the heritage building to remain, the Architect seeks to achieve a well-balanced design. The use of a simple elegant podium has the best chance of allowing the heritage building

and its rich texture to remain as the focal point and to retain its visual primacy to the greatest degree possible.

The conclusion continues:

The Consultant is of the opinion that the updated architectural design of the development project dated July 2, 2020, has generally addressed concerns related to the treatment of the podium façade in terms of height, massing, datum lines and materiality.

4.6.1 Heritage Buildings and Areas

Policy 2

Where a structure designated under Part V of the Ontario Heritage Act is to be altered, added to, partially demolished, demolished, relocated, or where new construction in a district designated under Part V of the Ontario Heritage Act is proposed, the approval of City Council, after consultation with its municipal heritage committee, currently known as the Ottawa Built Heritage Advisory Committee (OBHAC) is required. ...

The proposed development requires alteration to the heritage building. A Heritage Permit application will be submitted prior to finalizing approval of the Site Plan Control application.

4.6.4 Scenic Entry Routes

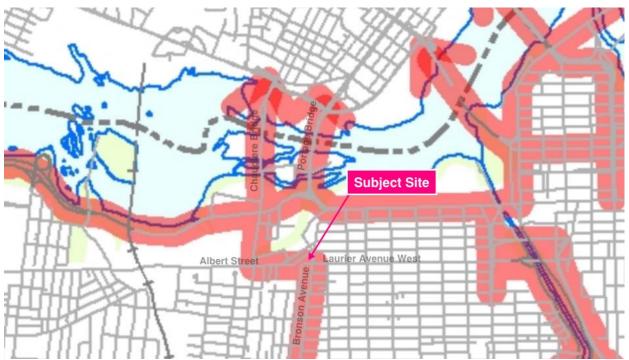


Figure 10: Scenic Entry Routes, Exerpt (Ottawa Officila Plan Schedule I as edited)

Policy 2

Guidelines for Scenic-Entry Routes that elaborate on the more general Arterial Road Corridor Design Guidelines, as updated from time to time, will be developed and implemented by the City. While respecting the primary function of the road, the guidelines will promote:

- 1. The creation of a safe and attractive environment for travellers including, where appropriate, such amenities as lay-bys, scenic lookouts, information, and directional signs to important urban and rural cultural, heritage, environmental and tourism destinations:
- Attention to such matters as building orientation, outside storage, access and egress, landscaping, fencing, lighting and signage to create an aesthetically pleasing streetscape;
- 3. The protection of views to natural and cultural heritage features, mature trees, and roadside vegetation along and beyond the right-of-way;
- Coordination of landscaping, berming, pathways and other features within the rights-of-way with the creation of such features on adjacent land, including the potential to locate these features on adjacent property;
- 5. Any other items determined by the City.

Policy 3

<u>Until such time as the guidelines for Scenic-Entry Routes are prepared, development applications adjacent to these routes will be assessed against the criteria listed above, in addition to other requirements of this Plan.</u>

The proposed development meets the above criteria in the following manner:

- 1. The proposed development creates a safe and attractive environment.
- 2. The stone wall remains in place and is the main feature of the site as seen from Bronson Avenue.
- 3. The cultural heritage feature (Alexander Fleck House) will remain visible.
- 4. Landscaping and pathways will be designed to meet City standards in the right-of-way on Laurier Avenue West. It is intended that the existing mature trees in the right-of-way on Laurier Avenue will be kept. No opportunity for right-of-way features is available to the Bronson Avenue side of this site given the placement of the existing retaining wall.
- 5. No other items were determined by the City.

4.7 Environmental Protection

There are no sensitive environmental features on or in proximity to the Subject Site.

4.7.2 Protection of Vegetation Cover

A revised Tree Conservation Report and Landscape Plan (both dated July 31, 2020) were prepared by Novatech. According to the Tree Conservation Plan the two mature trees in the right-of-way on Laurier Avenue West are proposed to be retained. The two trees on the west of the site are to be removed to make way for the proposed development. Most of the lilac bushes must also be removed in order to accommodate the proposed building. The Landscape Plan indicates that numerous large deciduous shrubs will be planted, in addition to small shrubs and small flowering plants. Proposed species are suitable for the local climate while being generally low maintenance.

4.7.3 Erosion Prevention and Protection of Surface Water

Erosion and sediment control is addressed in the revised Development Servicing and Stormwater Management Report prepared by Novatech dated July 31, 2020. The report concludes that: "Temporary erosion and sediment control measures are to be provided during construction."

4.7.4 Protection of Endangered and Threatened Species

An EIS is not required for the Subject Site.

4.7.6 Stormwater Management

The revised Development Servicing and Stormwater Management Report prepared by Novatech dated July 31, 2020 concludes that:

- The site flows from sub-catchment area R-1 will be attenuated using control flow roof drains, while flows from area A-3 will be controlled by an ICD and controlled prior to being discharged into the municipal sewer system.
- The total post-development site flow will be approximately 8.5 L/s during the 5-year design event and 10.5 L/s during the 100-year event. Post-development flows will be reduced by approximately 9.2 L/s (or 52%) during the 5-year event and by as much as 24.1 L/s (or 70%) during the 100-year design event, compared to current conditions.

The Servicing and Stormwater Management Report indicates that existing municipal water and wastewater infrastructure can accommodate the proposed development on the Subject Site.

4.8 Protection of Health and Safety

The Subject Site is not affected by *Environmental Constraints* identified on Schedule K of the Official Plan, such as flood plains, wellhead protection, Airports and unstable slopes.

4.8.3 Unstable Soils or Bedrock

A Geotechnical Investigation (dated June 2019, revised July 2020) was completed by by LRL Engineering for the Subject Site. Recommendations for design, construction and inspection are provided.

A Slope Stability Analysis was included as part of the Geotechnical Report. The analysis concludes, "the elevation changes to the east and the north of the property limits are constrained by a retaining wall, overlying bedrock, which is relatively resistant to erosion; thus, will remain stable".

4.8.4 Contaminated Sites

A Phase I ESA dated July 15, 2019 was completed by LRL Engineering. The Phase I ESA indicates that a Phase II ESA is required. The Phase I ESA (July 2015) identified the following environmental concerns to be investigated:

- The former heating oil tank located in the basement;
- The trap door in the garage over a gravel basement, purpose unknown;
- The former foundry identified east of the Site; and
- The unspecified spill on Bronson Avenue, east of the Site.

A Phase II ESA dated November 7, 2019 was completed by LRL Engineering. Finalizing a list of detailed conclusions, the Phase II ESA recommends:

... that the horizonal extent of the soil contamination be delineated and remediated. It is recommended that groundwater be resampled from MW19-1 for PHC F2 to determine the level since the detection limit was above the applicable standard. The contamination encountered onsite presents a low risk to the building occupants.

A contamination delineation letter dated November 8, 2019 was prepared by LRL Engineering and is submitted to accompany the Phase II ESA. The letter concludes:

The soil contamination onsite presents a low risk to building occupants if left undisturbed...it is recommended that the soil contamination be remediated at the time of Site development. The vertical extent of the contamination is anticipated to be from surface to bedrock, encountered at depths between 0.5m and 1.65m bgs. The horizontal extent of contamination has not been delineated, however it is anticipated to extend across the majority of the Site.

It is recommended that if groundwater monitoring wells are not required for future monitoring purposes, they should be decommissioned in accordance with O. Reg. 903.

The groundwater analysis results and respective MECP standards are summarized in Table 2 of the contamination delineation letter.

4.8.7 Environmental Noise Controls

A revised Noise Impact Study by Swallow Acoustic Consultants dated August 7, 2020 forms part of this resubmission. Please refer to the study or further details.

4.9 Energy Conservation Through Design

The project is not targeting any particular energy standards; however, the building will be designed with energy efficiency in mind. The requirements of the Ontario Building Code provide increasingly stringent requirements for the major building systems, and this project will exceed these targets.

Because this is to be a rental building, the owners will be operating and maintaining the building meaning that they have a vested interest in the energy efficiency of the project because they will have a direct financial benefit from reduced energy costs.

The tower portion of the building features extensive glazing, and these glazing units are being designed to have high insulation values and will include glazing units that contain coatings that limit passive solar heat gain that lead to increased cooling requirements. Wall assemblies will also have higher than required insulation values and will feature components that limit 'thermal bridging' in order to increase the performance of the assembly. The heating and cooling systems for the suites will be among the most efficient available with each suite having integrated heat recovery systems and complete control over their temperature.

An energy model will be completed for the project, and the report generated from this model will be our guide in ensuring that the building exceeds current standards for energy consumption.

Native landscaping and permeable soft and hard landscaping is proposed for the grounds.

4.10 Greenspace Requirements

Cash-in-lieu of parkland may be provided as a condition of the Site Plan Control application.

4.11 Urban Design and Compatible Development

The purpose of the policies that follow is to set the stage for requiring high quality urban design in all parts of the city and design excellence in design priority areas. Responses to the applicable policies follow.

Massing and Scale

Policy 12

Transition refers to the integration of buildings that have greater height or massing than their surroundings. Transition is an important building design element to minimize conflicts when development that is higher or has greater massing is proposed abutting established or planned areas of Low-Rise development. Proponents for developments that are taller

in height than the existing or planned context or are adjacent to a public open space or street shall demonstrate that an effective transition in height and massing, that respects the surrounding planned context, such as a stepping down or variation in building form has been incorporated into the design.

The proposed development is designed to keep and complement the three-storey heritage building on site. Design features that achieve this also work to provide transition from the proposed building to the neighbouring building to the west and, visually, to that across Laurier Street West. Such features include:

- Cladding the podium of the addition to complement the heritage building and create a visual separation between the new building's low-rise podium and the high-rise form above;
- A step back above the podium provides emphasis to the heritage building and draws the eye to the low-rise base.
- A 'thin' building addition (single-loaded corridor) lessens the massing by half when viewed at street level;
- Visual prominence given to the heritage house by 'hinging' the building addition around the heritage house.

Policy 13

Building height and massing transitions will be accomplished through a variety of means, including:

- 1. Incremental changes in building height (e.g. angular planes or stepping building profile up or down);
- 2. Massing (e.g. inserting ground-oriented housing adjacent to the street as part of a high-profile development or incorporating podiums along a Mainstreet);
- 3. Building setbacks and step-backs. [Amendment #150, LPAT July 19, 2019]

As described in the response under policy 12, the proposed building provides:

- 1. stepping back of the building as viewed from Laurier Avenue West, and a variety of step backs in the elevation facing Bronson Avenue;
- 2. ground-oriented housing (Alexander Fleck House) at the corner of Bronson Avenue and Laurier Avenue West;
- 3. a step back above the podoum draws attention to the low-rise base and the heritage asset.

The proposed development conforms to the City of Ottawa Official Plan.

3.2 Growth Management Strategy

The City of Ottawa is preparing a new Official Plan in accordance with the Planning Act. A report on the Growth Management Strategy for the new Official Plan was approved by City Council on May 27th, 2020. The City adopted a balanced approach to the Growth Management Strategy. This balanced approach set a target for 51 percent of new residential growth until 2046 to be through intensification. The percentage of new growth as intensification increases from 40% in 2018-2021, to 60% in 2041-2046. It is expected that Ottawa will grow by 402,000 people by 2046. This translates to approximately 92,100 new residential units by 2046 within the built-up area. The intensification rates are shown on the table below.

| Table 1 | Intensification | Rates of the | Ralanced | Scenario |
|-----------|-----------------|---------------|-----------|----------|
| I avic I. | IIIICHSIIICAUUH | raies ul lile | Daiaiiceu | SUCHAIIU |

| Timeframe | Urban Units | Intensification | Built-up | Greenfield | Greenfield Units |
|-----------|--------------------|-----------------|------------|------------|------------------|
| | | % | Area Units | % | |
| 2018-2021 | 24,300 | 40% | 9,700 | 60% | 14,600 |
| 2021-2026 | 38,800 | 45% | 17,500 | 55% | 21,300 |
| 2026-2031 | 35,800 | 50% | 17,900 | 50% | 17,900 |
| 2031-2036 | 31,200 | 54% | 16,800 | 46% | 14,300 |
| 2036-2041 | 7,400 | 57% | 15,600 | 43% | 11,800 |
| 2041-2046 | 24,300 | 60% | 14,600 | 40% | 9,700 |
| 2018-2046 | 181,800 | 51% | 92,100 | 49% | 89,700 |

The Growth Management Strategy is in place to align with the new Provincial Policy Statement with respect to providing a minimum residential supply that has an appropriate range and mix of housing, opportunities to satisfy market demand through intensification, redevelopment, locating growth to efficiently use existing infrastructure, reducing greenhouse gas emissions and improving air quality. The intensification of the Subject Site is in keeping with the direction of the Growth Management Strategy.

To help the City of Ottawa achieve the Balanced Growth Strategy, intensification of existing established neighbourhoods is required. The Subject Site is an excellent candidate for intensification, due its proximity to transit. Intensification of the Subject Site will contribute to the implementation of the Growth Management Strategy.

3.3 Escarpment Area District Plan

This Community Design Plan was prepared in 2006 to address the vast amounts of underdeveloped, publicly-owned lands within the Study Area seen in Figure 11. Throughout the Plan, the Subject Site is considered, 'residential', 'heritage' and 'not likely to change (currently built-out)', however the intent of the Plan is to provide "of the most sought after addresses for downtown living – offering unrivaled views over the city and the river, easy access to the core, plentiful green spaces and the best in quality new development" (Section 4.1: Vision).

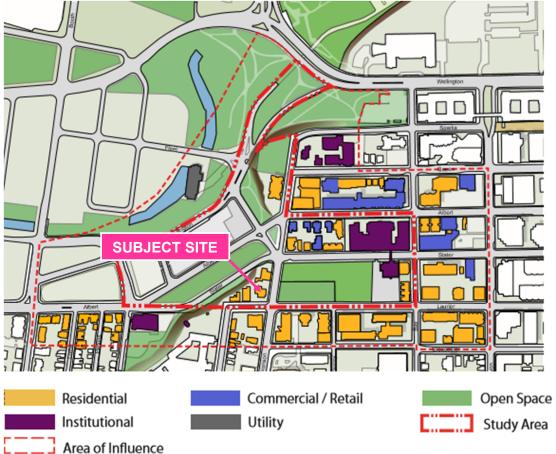


Figure 11: Land Use Map, Excerpt (Escarpment Area District Plan)

Section 4.1: Vision

The Subject Site is described as a target for new development despite other labels as it states, "At the top of the Escarpment, striking new residential developments will seamlessly integrate with existing towers to frame a major new community park – Upper Town Commons". Upper Town Commons is the focal open space for the Plan Area and can be easily identified today as the Nanny Goat Hill Community Garden, off-leash dog park and abutting greenspace containing a multi-use path. This area is bound by Laurier Avenue West, Bronson Avenue, Slater Street and the old Ottawa Technical School parking lot.

Section 4.3.2. Approach to Built Form

This section expects the Area to establish "a new benchmark for high-density development in Ottawa, one that embraces the high-rise character of the community yet is more pedestrian friendly, addresses the street better and results in a more visually appealing form of development".

As a result however, it does not provide design guidance for development that is not high-rise (i.e, buildings lower than 10 storeys in height). The section 'Building Components – Base-middle-top' is not applicable as a high-rise tower is not proposed. For the same reason, tower separation and floor plate size are not applicable. The closest property for which building height guidance is given

is 100+m to the east so this is not considered applicable (all the guidance heights are nonetheless considerably higher than the proposal).

The strategies relating to a buildings interface with the ground plane ('Creating a Positive Experience on the Ground') are more relevant, and an assessment is made against the general guidelines under 'Architecture'.

Creating a Positive Experience on the Ground

The section below outlines the design goals of this section and responds to them:

General Strategies:

• Buildings should be setback 3 to 3.5 metres from the property line to allow for streetscaping, planting and generous sidewalk widths.

The building is setback 1.3m from the property line. There is a generous boulevard with mature trees that will be retained. It contains a sidewalk, with space to widen if the City so desired.

• Buildings should create animated frontages through the use of windows, raised terraces/balconies and easily identifiable entrance ways.

The proposed building has an apartment across its full width at ground floor and every level above. The high level of glazing and street-fronting balconies further animated the frontage. The entrance to the existing Heritage building and the new building are clearly identifiable from Laurier Avenue.

Residential Strategies:

• The ground floor of the residential units should be no greater then 1.2 metres from the sidewalk level to provide for privacy.

Due to the topography of the site, the ground floor of the addition is more than 1.2m above sidewalk level. If the intention of this policy is to provide privacy, the proposal is consistent with that intent.

• Building lobbies should be accessed from the most prominent street fronting the building.

The building lobby is accessed from Laurier Avenue West which is the most prominent street fronting the building (and the only one from which access is possible).

 Ground floor residential units are to make use of setbacks for small private garden spaces or terraces.

Due to the finished floor levels, the basement apartments are too low and the ground level apartments are too high to have private garden spaces or terraces.

 Additional landscape features such as trees, small shrubs, low-railings or walls should be used to provide a clear delineation between the public realm and the private residential space.

The existing natural grade rise between the sidewalk effectively delineates the public realm and the private property.

Servicing & Parking Strategies:

• Servicing and parking should be accessed from secondary streets and away from main pedestrian entrances.

The site has only one practically useable frontage – access via Bronson Avenue is prevented by a very high retaining wall. The access to the two parking spaces is well separated from two of the three pedestrian entries but is adjacent to one. The impact is considered to be minimal as the parking is only for two cars.

- Parking and servicing facilities should be combined wherever possible to minimize their impact upon building frontages.
- Parking and servicing elements should not detract from the animation of the street through the creation of blank walls or false façade.

Parking is at-grade and no blank walls or false facades are used to hide servicing.

Architecture

The following guidelines have been considered:

1. Encourage architectural diversity in order to create a dynamic, contemporary image of the District; Promote buildings of an enduring quality;

The proposed building blends Ottawa's heritage and modern needs. The Alexander Fleck House is integral part of the redevelopment. The addition takes cues from the heritage asset, such as hinging the addition around the turret, stepping back above the podium and cladding the podium to complement the heritage building.

2. Horizontal and vertical building articulation are encouraged to provide long and/or tall façade variation;

The podium levels of the building feature a combination of horizontal and vertical articulations. The glazing cuts through the masonry base in two storey vertical columns. These two storey columns of window are staggered creating a horizontal line in the masonry. Adjacent to the Fleck house there is a canopy and fascia that extends from the top of the podium, giving a pronouced horizontal articulation. On the tower levels there is distinct vertical articulation of the cladding panels that is offset by the horiztonal banding of the balconies..

3. Provide an opportunity for the integration of public art with the building;

Public art is not provided, however significant efforts will be made to restore the interior and exterior of the heritage building in order to make it a lasting piece of local heritage.

4. Providing a mix of materials and colours are encouraged to provide design variation; and

The project will feature a number of cladding materials. The proposed addition is clad to match the Andrew Fleck house. On the tower portion of the building there will be a combination of composite metal panels of differing colours and levels of sheen, along with glazing units which provides variation in colour as well as texture.

5. Recessed and/or integrated exterior balconies should be considered to articulate and modulate building façades.

All balconies in the building are recessed and are integrated into the design of the project.

The proposed building generally meets the expectations of the Escarpment Area District Plan. Although the Subject Site is hardly addressed by the Plan, the design intent is inferred from the description of the Plan Area and the lands surrounding Upper Town Commons.

Section 4.4 Where Change May Occur

The map in this section designates the subject site as 'Change Unlikely: Existing Zoning to Remain'. The map does not designate it for 'special heritage consideration' despite there being an important heritage building on the site. This section can only be considered a guide – whether sites change or an application for a zoning by-law amendment is made is not controlled by a district plan.

Sections 5, 6 and 7

The subject site is not identified in Section 5 (Open Space Opportunities) or Section 6 (Development Opportunities). The final Section 7 outlines key interventions and implementation and incentive tools.

3.4 Zoning By-law 2008-250

The Zoning By-law Amendment proposes to rezone the Subject Site from Residential Fourth Density, Subzone T (R4T) to Residential Fifth Density, Subzone Q, with an urban exception and a 30 metre height limit [R5Q XXXX H(30)].

The purpose of the Residential Fifth Density Zone is to:

- a. allow a wide mix of residential building forms ranging from detached to mid- to high-rise apartment dwellings in the General Urban Area, Mixed Use Centres or Central Area in the Official Plan;
- b. allow a number of other residential uses to provide additional housing choices within the fifth density residential areas;
- c. permit ancillary uses to the principal residential use to allow residents to work at home and to accommodate convenience retail and service uses of limited size; and
- d. regulate development in a manner that is compatible with existing land use patterns so that the mixed building form, residential character of a neighbourhood is maintained or enhanced.

The proposal provides an opportunity to integrate a prominent local heritage building with a modern, mid-rise residential addition. Mid-rise apartment building is a permitted use in the proposed zone. With the exception the provisions outlined below, the proposed development has been designed in accordance with the zoning provisions of the R5Q zone as well as other applicable provisions in Zoning By-law 2008-250.

The table below summarizes relevant zoning performance standards and the standards provided by the proposed development. Bold pink text identifies areas of non-compliance:

| Zoning Information: R5Q XXXX H(30) Zone | | |
|---|--|---------------------|
| Performance Standards | Required | Proposed |
| Minimum Lot Width (m) | 18 | 29.9 |
| Minimum Lot Area (m2) | 540 | 1401 |
| Maximum Building Height (m) | Shown with an H(#) on the Zoning Map, on a Schedule or in the exception zone. | 30 |
| Minimum Front Yard Setback (m) | 3 | 1.3 |
| Minimum Corner Side Yard Setback (m) | 3 | 7 |
| Minimum Rear Yard Setback (m) | 7.5 | 2.75 |
| Minimum Interior Side Yard Setback (m) | 7.5 | 1.5 |
| Landscaped Area | 30% lot area | 39% |
| Minimum Parking Spaces | 0.5 per d.u in excess of 12. = 26 | 0 |
| Minimum Visitor Parking Spaces | 0.1 per d.u. in excess of 12 = 5 | 2 |
| Minimum Bicycle Parking Spaces | 0.5 per d.u. = 32 | 38 |
| Minimum Total Amenity Area (m²) | 6m² per d.u. = 342 | 398 |
| Minimum Communal Amenity Area (m²) | 50% of total = 171 | 316 |
| Location of Amenity Area | must not be located in a required front or corner side yard | In corner side yard |
| Width of a Walkway | Max 1.8 | 3.09 |

The proposed R5Q zone is consistent with zoning for lands near the Site and provides the closest framework for appropriate development on the Site. The urban exception will accommodate the following changes to the zone given the uniqueness of the Site in terms of its shape, heritage asset and proximity to the adjacent existing and planned high-rise communities with no residential parking requirements.

Setbacks

The proposed front yard setback is 1.3 metres which is in line with the apartment building immediately to the west. This will allow the building to wrap around the heritage building and provide better animation at street level. A boulevard of approximately 5 metres is provided by City-owned land between the street and the front property line on Laurier Avenue West. This gives the street a sense of openness despite the reduced front yard setbacks.

The rear yard setback is 2.75 metres. This will allow the building to wrap around the heritage building. The rear yard is on the northern portion of the lot, which has an irregular shape and is adjacent to 140 Bronson Avenue which itself is unusual in being located almost entirely below the current ground level of the subject site as a result of historic cut and fill.

The interior side yard setback is 1.5 metres, adjacent to the property to the west at 601 Laurier Avenue West. The heritage building cannot be moved to accommodate a wider yard and the building's width (8-9m) cannot be further reduced. When walls and the corridor are taken out, the internal width of the apartments is approximately 5.5m. Reducing this any further will affect the livability of the apartments. The proposed R5Q zone requires a setback of 7.5m when there is an R1, 2, 3 or 4 zone adjacent. In this case, the adjacent property is zoned R4. It is worth noting that if the adjacent property were zoned R5 for example, like land across Bronson to the east and between Slater and Albert Streets to the north, the required interior side yard side would be 1.5m for the first 21m back from the frontage and 6m for the remainder.

<u>Parking</u>

Relief from the parking requirements is required. The subject site is in Area X on Schedule 1A of the Zoning By-law which requires 0.5 resident parking spaces per dwelling unit, for any units in excess of 12 and 0.1 visitor parking spaces per dwelling unit, for any units in excess of 12. It is worth noting that the site is surrounded on three sides by Area Z on Schedule 1A which requires zero resident parking. For the 63 proposed units, 26 resident and five visitor spaces are required. It is proposed to provide zero resident parking and two visitor spaces.

As outlined in the section addressing the relevant OP policies, the expectation is that residents will choose walking, cycling and using transit for their daily commutes as they will be in a prime location 450m west of the main commercial downtown core (taken as east of Lyon Street) and within an 800m walk of Lyon and Pimisi LRT stations. The site is within 60m of bus services on Bronson Avenue and within 250m of services on Slater and Albert Streets. There is a share car Communauto 'station' at 600 Laurier Avenue West, directly across the street from the subject site. This could conveniently be used by residents for occasional car use. There is a second station 160m south on Bronson and a third and fourth within 500m as back-ups. This is an ideal location to reduce resident parking to zero.

Two parking spaces are proposed to accommodate visitors to the development. Five visitor parking spaces are required under the Zoning By-law. This suggests that 60% of the visitors who would have parked on the site will need to either park off-site or use alternative means of transport. It is accepted that on-street parking nearby is at or near capacity and visitors driving to the site could not rely on it. There are seven commercial parking lots of varying size within 400m of the site, which make driving a private vehicle to the site less convenient, but certainly not impossible. It is not logical to discourage private car use among residents whilst encouraging it for visitors. It is logical for visitors to the site to adopt the approach of the residents and not rely on private cars at all. The proposal discourages visitors from driving private vehicles to the site but does not make it impossible to do so. This approach only works if there are viable alternatives and for this site there are. The site's location is in an area of the City that is rich with transit and share car and active transport options.

Amenity Area

Section 137 (3) requires that: "Amenity area provided outdoors must not be located in a required front or corner side yard." The proposal locates 141m² of amenity area in the corner side yard, although only 121m² of this is required amenity area as there is an over-provision. The grade difference and appropriate fencing will ensure privacy and reduce noise impact. This will result in an amenity area that is no different than amenity area located in interior and/or rear yards.

Walkways

The east and west walkways require relief for maximum width of a walkway provided by the Zoning by-law which is 1.8m. The entry to Andrew Fleck House utilizes the two existing flights of stairs and the 3m width walkway matches the stairs. The second, western walkway is 2.1m wide to provide access to the garbage room, a City requirement.

4.0 Public Consultation Strategy

Communication with the immediate neighbours has been ongoing. As part of the initial application in December 2019, two public meetings were proposed. One has been held, with the Dalhousie Community Association. Due to the significant changes to the proposal, it is proposed to have another two meetings

Open House #1:

Who: the Dalhousie Community Association's (CA) members

Where: a virtual meeting at the time of the CA's choice

When: immediately after this resubmission is publicly available on DevApps. (This is in

order to make the CA members aware of what is currently proposed.)

City rep.: a City representative is not required at this time, however, should the City wish to

send a representative they are welcome to do so.

Follow-up: Comments and other feedback from the meeting will be collected by the Project

Team during the meeting, and we will ask the Community Associations to submit to us a consolidated account of their comments and questions. We will keep the Primary Contacts from the Community Associations abreast of changes as the

project progresses.

Open House #2:

Who: attendees of the first meeting and the broader interested public.

Where: a virtual meeting at a time suggested by the Community Associations

When: soon after the City's circulation and comments on this resubmission are received

by the Project Team.

City rep.: the File Planner may wish to attend, depending on the level of interest and/or

controversy. This can be determined after the first round of City comments are

received. Councillor McKenney will be invited to attend.

Follow-up: The Project Team will do their best to keep interested citizens informed of bigger changes and/or the final submission that will be heard at Planning Committee.

5.0 Conclusion

The Zoning By-law Amendment proposes to rezone the Subject Site from Residential Fourth Density, Subzone T (R4T) to Residential Fifth Density, Subzone Q, with an urban exception and a 30 metre height limit (R5Q XXX H(30)). This rezoning will facilitate the construction of a nine storey residential building and will preserve and enhance the Alexander Fleck House, a designated heritage building.

The proposed rezoning and development are consistent with the Provincial Policy Statement as they introduce desirable and affordable residential options to meet the needs of residents in the neighbourhood. The proposal promotes the efficient use of land, resources, infrastructure, municipal services and public facilities.

The proposed rezoning and development conform to the City of Ottawa Official Plan by supporting the intensification of the Subject Site in a cost-effective pattern, utilizing existing services, infrastructure and transit. The proposal also contributes to providing a full range of housing types, tenures and densities in the surrounding area by contributing smaller apartment units. This compact mid-rise building will enhance the community's diversity and will help to meet the needs of some members of society, such as older singles or younger couples. Additionally, the revitalization and use of the Alexander Fleck House for six residential units provides an adaptation of a heritage asset for modern life.

The proposed development and rezoning establish appropriate zoning standards for the Subject Site as the Residential Fifth Density Zone supports mid-rise apartment dwellings in areas designated as General Urban Area in the Official Plan and the exception moulds the zoning to the uniqueness of the Site.

The proposed development and Zoning By-law Amendment are desirable and represent good land-use planning.

Sincerely,

NOVATECH

Prepared by: Reviewed by:

James Ireland, BUPD
Project Planner, Planning & Development

Murray Chown, MCIP, RPP Director, Planning & Development