



28 November 2013

Hieu Nguyen
Planning Department
City of Ottawa
110 Laurier Ave W.
Ottawa, ON K1P 1J1

**RE: FILE NOS. D02-02-13-0093 (ZONING BY-LAW AMENDMENT) &
D07-12-13-0180 (SITE PLAN CONTROL)**

Dear Ms. Nguyen,

Action Sandy Hill (ASH) is a volunteer-led community association that represents and promotes the interests of Sandy Hill and its residents. One of our primary objectives is to preserve and enhance Sandy Hill's residential integrity and unique urban heritage in architecture and landscapes. To that end, we believe that any development in Sandy Hill should be required to be respectful of the surrounding neighbours and make a positive contribution to the overall community.

With the above in mind, ASH has vociferously opposed the conversion of single-family homes to de-facto student residences and will continue to do so. We appreciate that a purpose-built and professionally managed student residence, such as the one proposed here, may be a positive change from the type of student housing that we have seen developed thus far. However, given that the City does not currently identify such a permitted use in the zoning by-law and, therefore, has no policies related to such development, we must oppose the application to amend the zoning bylaw and for site plan control for the site known as 45 Mann Avenue.

One of the primary elements of the applicant's planning rationale for the project is that such a development would alleviate the current pressure on the community for student rental accommodation. On the basis of what study, analysis or report is this assertion made? If no study has been carried-out to support this claim, then it is wholly inadequate as a planning rationale. To the contrary, there is significant concern within the community that such a development will simply bring additional students into the neighbourhood who currently reside outside of Sandy Hill because they couldn't find accommodation here, thus exacerbating the growing imbalance in the diversity of the neighbourhood. Additionally, we have the following specific concerns regarding the proposal submitted.

Provincial Policy Statement: The preamble to the Provincial Policy Statement states that it "*supports the provincial goal to enhance the quality of life for the citizens of Ontario.*" We would argue that the construction of a purpose-built student residence off-campus to house more than 355 students when the City does not have any policies governing such a development may have a significant negative impact on the quality of life of the citizens in Sandy Hill.

Official Plan: The Official Plan directs significant intensification to the Central Area, along Mainstreets, and within Mixed-Use Centres and Town Centres. This area of Sandy Hill is identified as General Urban

Area and Mann Avenue is not identified as a Mainstreet, therefore, this area is not targeted for such major intensification. In fact the Official Plan states that, "*within lands designated General Urban Area, opportunities for intensification exist and will be supported, although such opportunities are generally at a much smaller scale.*"

Sandy Hill Secondary Plan: The Sandy Hill Secondary Plan identifies four general objectives which are:

- a) To preserve and enhance Sandy Hill as an attractive residential neighbourhood, especially for family living.
- b) To provide for a broad range of socio-economic groups.
- c) To accept a modest increase in population, primarily as a way of housing some of the growth in the Central Area labour force.
- d) To maintain and co-ordinate both the local functions of Sandy Hill (primarily as a residential neighbourhood) and the functions that serve a wider area (e.g., the mainstreet mixed uses area along Rideau Street and the University of Ottawa).

This proposal fails to meet three of these objectives. This proposed development certainly does not serve to provide residential accommodation for family living and may negatively affect the quality of life of the families who already live in the neighbourhood. This type of development may provide housing for a certain demographic, but it is one that is already well served in Sandy Hill where there are numerous licensed and unlicensed rooming houses and a very high proportion of rental accommodation, therefore, this development would not provide for a broad range of socio-economic groups but rather contribute to the loss of diversity in the neighbourhood. Furthermore, this development would not result in a modest increase in population, nor is it intended to provide housing for the growth in the Central Area labour force; this issue is addressed further under the heading "density", below.

Density: The development of this property to include a minimum of 355 residents in 136 units is far too significant a density. The site has a total area of 0.28 hectares, with 355 residents that would be a density of more than 1200 people per hectare. The current density in Sandy Hill is less than 100 people per hectare. The applicant uses the proximity to the Lees and Campus LRT stations as partial justification for this application but the TOD study for Lees recommends densities of between 250 and 500 residents per hectare on the perimeter of the TOD study area.

Height: The proposed increase in height, from 19 metres to 28.5 metres, is also too significant. Since virtually all of the abutting or adjacent properties are considerably lower, the height combined with the mass of this development will be out of scale, particularly for the low-rise primary school adjacent to the east side of the property. Again, the applicant uses the proximity to the Lees and Campus LRT stations to justify the height, but the Lees TOD study recommends maximum heights of 6-storeys or 20 metres on the perimeter of the TOD study area. The proposed height may set an undesirable precedent. Before allowing such, a review of the secondary plan should be undertaken.

Amenity space: The developers propose to include amenity space in part through the inclusion of a large rooftop terrace on the northwest corner of the property. Roof top terraces of this size are virtually non-existent in the neighbourhood and in this case will almost certainly be detrimental to the neighbours, whose quality of life will be affected due to the noise and loss of privacy and enjoyment in their own yards. If this rooftop amenity space is to be retained, we would recommend that it be located on the southwest corner of the property where there is less chance of its presence disturbing neighbouring properties.

Parking: The reduction from the required 86 parking spaces to just 52 is inappropriate. On-street parking in Sandy Hill is already overtaxed and the City does a disservice to the community by continuing to allow significant reductions to the parking requirements based on biased parking studies that suggest that there is no issue. If the City wants to change their parking requirements, then a thorough parking study must be undertaken by the City. Until that occurs, the City must stop allowing developers to continually reduce their parking provisions as it leads to overdevelopment. The justification that less parking is required as the building will only be home to students is not appropriate either as the City has indicated that it will assess this development as a mid-rise apartment building.

As identified, there are many reasons why ASH opposes this application, chief among them being that purpose-built student housing is not a permitted use and therefore the City has no policies by which to adequately assess this proposal.

Sincerely,



Chad Rollins
Vice-President, ASH

Cc: Mathieu Fleury, Councillor, Ward 12