



15 November 2013

Bliss Edwards  
Planning Department  
City of Ottawa  
110 Laurier Ave W.  
Ottawa, ON K1P 1J1

**RE: FILE NOS. D01-01-13-0012 (OFFICIAL PLAN AMENDMENT) &  
D02-02-13-0086 (ZONING BY-LAW AMENDMENT)**

Dear Ms. Edwards,

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 official plan and rezone the site known as 261-281 Laurier Avenue East and 400 Friel Street.

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 up to 650 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 Laurier 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 this area as low-profile residential, contrary to the applicant's proposal for a mid-rise development. The Sandy Hill Secondary Plan also 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 proximity to the site. 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 up to 650 residents in 180 units is far too significant a density. The site has a total area of 0.43 hectares, with 650 residents that would be a density of 1500 people per hectare. The current density in Sandy Hill is less than 100 people per hectare and the current density of the site is about 280 people per hectare. The applicant uses the proximity to the Laurier Transitway station as partial justification for this application, but by the time this building is built that station will no longer be part of the Rapid Transit network as the eventual opening of the Campus LRT station will negate the Laurier Transitway station. If we were to instead consider the proximity to the Campus LRT station, we'd note that no TOD study has been carried-out for this station. However, even in the areas that the City has carried-out TOD studies they are recommending densities of between 250 and 500 residents per hectare on the perimeter of the TOD study area.

**Height:** The proposed increase in height, from 14.5 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 neighbours to the north along Wilbrod. Again, the applicant uses the proximity to the Laurier Transitway station as partial justification. Again, it would be more relevant to refer to Campus LRT station. In the areas that the City has carried-out TOD studies they are recommending maximum heights of 6-storeys or 20 metres on the perimeter of the TOD study area. The proposed height increase is also contrary to the Sandy Hill Secondary Plan which identifies this area as low-profile residential and may set an undesirable precedent. Before allowing such, a review of the secondary plan should be undertaken.

**Setbacks:** The applicants are proposing a rear yard setback of just 3 metres rather than the 7.5 metres required. Given the height of the building this will cause significant loss of light and privacy in the rear yards of the abutting properties.

**Parking:** The reduction from the required 146 parking spaces to just 62 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.

**Urban Design:** Although we appreciate that design issues are largely subjective, given all the effort to preserve some aspects of the past, particularly the streetscape via a reconstruction of the existing facades of some of the buildings, we feel that the portion of the building from the 4<sup>th</sup> floor up appears rather stark and uninteresting. Rather than having a blank monolithic appearance, effort should be made to better reflect the character of the surrounding built environment.

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  
Robert Viner, CEO, Viner Assets Inc.