



January 7, 2022

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Subject: D02-21-0020 641 Rideau St. Zoning By-Law Amendment, D02-01-21-0002
641 Rideau St. Official Plan Amendment

Dear Mr. Deiac:

The proposal for 641 Rideau Street, as presented, is unacceptable for the reasons set out below. Furthermore, Action Sandy Hill (ASH) finds the period for comment over the holiday season in the midst of the pandemic was unreasonably short.

Radical Increase sought in Floor Space Index (FSI) and Building Height

The applicant seeks an Official Plan Amendment that would affect the Uptown Rideau Secondary Plan by virtually eliminating a Floor Space Index (“FSI”) limit as it applies to the site by requesting an FSI of 6.9. It wants to introduce a Site-Specific Amendment to revise the density redistribution policies to allow a 25-storey high-rise apartment building. It also seeks a Zoning By-law Amendment to change the Traditional Mainstreet, Subzone 6, Floor Space Index 3.5, Maximum Building Height 19 metres, denoted as TM6 F(3.5) H(19) in the City of Ottawa Comprehensive Zoning By-law (2008-250).

Its important to remember that prior to the 2015 revision of the Uptown Rideau Street Community Design Plan the maximum height for this site was 6 floors and an FSI of 3.5. Now the applicant seeks to build a 25-floor apartment building with an FSI of 6.9 to accommodate an 80-metre tower. No property on Rideau Street has an FSI exceeding 6. Even so, the FSI limit for the 641 Rideau is 5.0.

As the property does not sit on at least two public realms it therefore does not qualify for density redistribution. How is it that the revised 6 year old Uptown Rideau Street Community Design Plan could be ignored to allow for a spot zoning design of such magnitude?

The precedent would then be set and effectively open the Secondary Plan to further site-specific amendments in the case of every other new development on the north side of Rideau Street. It may prompt FSI increases in other traditional main streets across Ottawa?

The two largest lots on Uptown Rideau Street could absorb slightly more density and still meet the built form and public realm design objectives of the CDP. Those sites were 151 Chapel Street at the corner of Rideau Street where a high-rise residence and abutting podiums is under construction. The second site is the Loblaws property at 363 Rideau Street. Both properties met the criteria for density redistribution being of at least 4000 square metres and the FSI does not exceeding 6.0. The 641 Rideau requests an FSI of 6.9 on a property of only 2792.2 square metres. This is an egregious request, which greatly exceeds the criteria set out in the URCDP and Secondary Plan.

HERITAGE BLOCK FACES 641 RIDEAU

The south side of Rideau Street facing 641 Rideau contains the only entire block of heritage residences on Rideau Street. These heritage properties are not acknowledged in photos or written form in any document submitted for public review. At the same time, the Vision Statement in the Uptown Rideau Street Secondary Plan states, “Occasionally, taller buildings rise above human-scaled podiums, transitioning in height towards the Central Area and adding visual interest to the skyline. The buildings that line the street are a mix of heritage and new buildings, the latter achieving sensitivity to established neighbourhoods, strong contributions to the pedestrian realm, and a high-level of architectural excellence befitting of a premiere street in the National Capital.” This development proposal provides no “sensitivity” for the existing heritage streetscape and is found in the location furthest away from the Central Area. The proposed 80-metre building provides no transition to the heritage block of 2 and 2 ½ floor homes on the south side of the Rideau Street and the adjacent Besserer-Wurtemberg Heritage Conservation District.

FLOOR PLATE EXCEEDS MAXIMUM

Section 5.4 of the Secondary Plan addresses Built Form Principles and states the maximum floor plate is 750 square metres yet even the revised proposal calls for 797.2m² far exceeding the maximum.

Traffic data collected in the early stages of the pandemic underestimate normal and to be expected traffic flows. The traffic study area is very limited in size and does not even take into account traffic generated from hundreds of apartments from 151-153 Chapel development now under construction.

During the ongoing affordable housing crisis in Ottawa, the proposal does not provide an adequate number of units that could accommodate families.

SHADOW ANALYSIS STANDARD NOT MET

The standards set out in the Shadow Analysis, Terms of Reference set by the City Of Ottawa have not been met. Therefore the impacts of this very tall building are understated and no written summary has been provided on shadow sensitive areas. Besserer Park would in the shadow of this high-rise development for hours even on the Summer Solstice. Those Terms of Reference are found at:

https://documents.ottawa.ca > tor_shadow_analysis_en

NO GEOTECHNICAL REPORT PROVIDED

No geotechnical report was provided. Even though part of this property sits on an unstable slope. The absence of input by the Rideau Valley Conservation Authority (RVCA) in the matter is required given its regulatory responsibility for at least a portion of the property is a concern. The proposed excavation of a four-floor underground parking garage that could significantly affect the slope stability in the immediate area.

The RVCA online mapping tool notes: **641 RIDEAU ST AREA**

-Acres: 0.67 -sqm: 2,719.16

It appears this property is located within the regulated area of a floodplain, valley land, slope or wetland.

Please contact the RVCA for confirmation: development@rvca.ca or 613.692.3571 ext 1193 or 1132

Lower Rideau River > Rideau River - Rideau Falls

Township: OTTAWA

Lot: LOT B

Con: BROKEN FRONT D

Municipality: CITY OF OTTAWA

County: CITY OF OTTAWA

REGULATIONS:

Genregs: 208.42m2 7.66% of Parcel Area

DOMINANT HAZARDS:

Unstable Slope: 100% Parcel Reg Length”

NO TREE CONSERVATION REPORT PROVIDED

It is noted that no Tree Conservation Report was provided.

CLOSING STATEMENT

Action Sandy Hill opposes this project proposal as it clearly fails to meet the directions of the Uptown Rideau Community Design Plan and the Uptown Rideau Community

Secondary Plan. The proposed building would have a negative impact on the established neighbourhoods on both sides of Rideau Street.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Khazaeli". The signature is fluid and cursive, with the first letter 'S' being particularly large and stylized.

Susan Khazaeli, PhD
President, Action Sandy Hill