



17 October 2013

Nina Maher  
Planning Department  
City of Ottawa  
110 Laurier Ave W.  
Ottawa, ON K1P 1J1

**Re: File Nos. D02-02-13-0076 (Zoning By-law Amendment) & D07-12-13-0155 (Site Plan Control)**

Dear Ms. Maher,

Action Sandy Hill (ASH) is a volunteer-led community association whose aim is to represent the best interests of Sandy Hill and its residents. To this end our members volunteer countless hours of our free time to study and respond to development applications affecting our community. As we have already devoted significant resources to preparing our original submission (copy attached), we feel it critical that we submit a rebuttal to the letter from Mr. Rakan Abushaar (copy attached).

First, Mr. Abushaar's letter goes to great length to suggest that they have been open in their communications with the community and that ASH has not reciprocated. In fact, ASH has met with the developer on at least three occasions to discuss this development and has provided feedback at each opportunity. Indeed, Mr. Abushaar was copied on our submission to the City (copy attached) and we indicated at that time that we would welcome further discussions, particularly with a view to refining the proposal to make it more acceptable to the community. Community consultation implies that the developer is seeking advice from the community on how to make their proposal tolerable, unfortunately, while the developer has met with the community several times, they appear to have completely disregarded all the concerns that we have raised.

Contrary to the false impression given by Mr. Abushaar's letter, ASH's initial qualified support of their purchase and redevelopment of the former Saint Clement's Church rested on certain characteristics of their proposal. In our letter to Mr. Abushaar dated February 11, 2013 (copy attached), we clearly identified that our support was predicated on the following aspects of the proposal:

1. That they were planning to keep the church on the property and repurpose it as a residential establishment;
2. That the new building being planned for the location of the current manse reflected the architecture of the church and mirrored its characteristics; and,
3. That the proposal included a mix of accommodations, including bachelor units and five two-bedroom units.

In the same letter we raised the following concerns about the proposal:

1. That the small size of the bachelor units would not afford a comfortable living space for the professional people and seniors that the developers claimed they wanted to attract and that, because of the small size of units, the building would become a de facto student residence;

2. That we were also concerned about adding massing to the eastern side of Russell Avenue; and,
3. That we had concerns about any development that puts even more pressure on our neighbourhood for street parking.

Finally, in that letter, ASH provided qualified support for this project and stated that,

*The qualification resides in two areas:*

1. *ASH reserves the discretion to retract its support should the plans change in any significant fashion – i.e. should the project be increased in size/density or the new proposed building increased in bulk, should the repurposing objective be dropped or should there be a marked departure from the architectural style proposed for the new building portion; and,*
2. *We have not had the benefit of broader consultation with members of the community, due to the confidential nature of your initiative to purchase the property, and these members may bring to light issues that are important to consider.*

Unfortunately, in the application to the City the developer has chosen a design for the new building that is a marked departure from the architectural style of the original church and the mix of accommodations has completely disappeared in favour of only bachelor suites. As such, ASH chose to exercise our option to retract support for this project.

I would like to address some of the specific points that Mr. Abushaar has raised in his letter:

1. The views of the original church will be almost completely obscured by the proposed addition which is out of scale with the original structure and far too bulky for the site. One need only look at the perspective images the developer has included in their application to see that the dominant feature when looking east from either Mann or Russell is now the new addition rather than the church.
2. Mr. Abushaar tries to rationalize that their proposal meets the objectives of the **Sandy Hill Secondary Plan**; however, we continue to assert that this is not the case. The **Sandy Hill Secondary Plan** identifies four key objectives which are:
  - a) To preserve and enhance Sandy Hill as an attractive residential neighbourhood, especially for family living.

As previously stated, this proposed development certainly does not serve to provide residential accommodation for family living as it is composed exclusively of bachelor suites and will, in all likelihood, negatively affect the quality of life of the families who already live in proximity to the site. Therefore, it does not preserve and enhance Sandy Hill as an attractive residential neighbourhood, especially for family living, but contributes further to the demographic shift that is occurring.

- b) To provide for a broad range of socio-economic groups.

Mr. Abushaar argues that “there is a lack of practical and viable residential options in Sandy Hill for individuals looking for single person dwellings”. On the contrary, according to the Ottawa Neighbourhood Study, currently 47% of private households in Sandy Hill are occupied by 1 person, compared to the City average of 27%. Mr. Abushaar specifically indicates that this development will appeal to “young professionals, professors and mature students”, a demographic that is already over-represented in Sandy Hill where, according to the Ottawa Neighbourhood Study, fully 30% of the current population are between the ages of 20 and 29, compared to the City average of just 14%. (<http://neighbourhoodstudy.ca/>)

- c) To accept a modest increase in population, primarily as a way of housing some of the growth in the Central Area labour force.

As previously stated, regardless of the developer's intent, this proposal will become de facto student housing; and, therefore, does not provide housing for the growth in the Central Area labour force.

This proposal is part of a current trend to build purpose-built student housing that will lead to significant increases in our population, and all from a single demographic. If this trend continues unguided and uncontrolled by the City it threatens the very social fabric of Sandy Hill. Proposals that have been completed over the past year and/or that are currently in process will add almost 2,500 more student beds to the neighbourhood, or an almost 20% increase in the population.

STUDENT HOUSING PROPOSED FOR SANDY HILL		
Address	Status	Beds
353 Friel	Opened 2013	98
87 Mann	Application pending	60
45 Mann	Application pending	363
Henderson residence (UofO)	Opening 2015	165
275 Laurier	Application pending	650
RFI for off-campus residences (UofO)	Opening 2016	1000
<b>TOTAL</b>		<b>2336</b>

- 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).

Mr. Abushaar argues that since their proposal includes some commercial space that they are providing a function that serves the wider area. However, since this development is not located on a mainstreet, such as Rideau, this argument is spurious at best.

3. **Density:** Mr. Abushaar argues that ASH originally supported the proposed density, again that assertion is false. In our letter dated February 11, 2013, ASH raised our concern about the density and requested that the developer, "consider an interior configuration with larger single- and double-occupant units." Further we stated that, "we recognize that this will impact on the overall number of units but we feel that it is essential to the overall wellbeing of the neighbourhood that rental properties offer comfortable living space and attract a diversity of clientele." So from that early stage we were arguing for fewer units and less density. Mr. Abushaar also tries to assert that he could simply build a rooming house on the site if he wanted to maximize density. Again, that is an inaccurate assertion since part of the site is currently zoned R4H and rooming house is a prohibited use.
4. **Height:** As the developer is asking that the whole property be zoned residential, that is the height limits that would apply. Therefore, as previously stated, although the increase in height may seem insignificant, the height combined with the mass of this development will be out of scale, particularly for the neighbours on Russell Avenue. ASH has raised concerns about the scale and massing of any new build along Russell since our letter of February 11, 2013.
5. **Parking:** 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 the 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.

Finally, Mr. Abushaar suggests in his letter that the change from a pitched to a flat roof is only a minor change calling it “only a cosmetic matter”. On the contrary, this change leads to more interior space, a larger and bulkier mass, and a vast rooftop terrace that will likely cause significant loss of quality of life for neighbours. Not to mention that the cosmetic appearance is important as it is what we see every time we walk or drive past a building. It's extremely important and it's the reason that we were happy that the church was to be preserved. It was the appearance of the church, the cosmetic appearance of it that was and is important. The adjacent building design that reflected the peaked roof was welcomed because of its cosmetic appearance and relationship to the original structure.

In summary, ASH must continue to oppose this application in its current form.

Best regards,

Chad Rollins  
Vice-President, ASH  
Co-Chair, Planning Committee

Cc: Mathieu Fleury, Councillor, Ward 12  
Rakan Abushaar, Director, Black Iris Developments