



July 13, 2019

Steve Gauthier
Planning, Infrastructure and Economic Development
110 Laurier Ave West
Ottawa, ON K1P 1J1

Re: 250 Besserer St. - D02-02-19-0051 & D07-12-19-0078

M. Gauthier:

Action Sandy Hill (ASH) members have taken the time and made the effort to assemble comments and suggestions on the proposed development at 250 Besserer. As the development is presented at the moment, ASH opposes it. Our reasons are enumerated below.

Overall context for ASH comments

Development has impacts in a larger context than on one property. Since 2012, the residential core of Sandy Hill (approx. 1.5 km² in size) has seen nearly 2,900 bedrooms added to its housing stock. The majority of these 2,900 bedrooms have been purpose-built for students attending the University of Ottawa. Prior to 2017, large bedroom counts were typical of these new builds. Not one new bedroom has been added to Sandy Hill's traditional main street, Rideau St.

The increase in student tenant density has led to negative externalities for the entire neighbourhood. These directly affect residents' quality of life and include:

- greater instances of excessive noise (over 350 noise complaints registered with 311 in both 2016 and 2017, for example) and numerous cases of rude and anti-social behaviour by students;
- considerably more garbage produced and a commensurate lack of garbage management – leading to garbage in our streets and most recently to an increase in the rodent population;
- instances of large, unsanctioned street parties for Panda Game, St. Patrick's and Canada Day, resulting in trespassing, property damage, and added burden and costs to Bylaw and the Ottawa Police Service; and,
- quality of life issues for students themselves, in particular with respect to the numerous examples of sub-par student housing on the rental market in Sandy Hill, with disproportionately high rents and poor, if not dangerous, living conditions.

Overall, Action Sandy Hill cannot sanction the City's current policies on density as the particular market forces at work in our near-campus neighbourhood make them untenable. The current zoning



consistently attracts profit-driven developers to build sub-standard dorm-like units to minimum building code for a student housing market. Other housing models (including semis, duplexes, apartment units with footprints that support a family, etc.) cannot compete with these market forces. They drive the pricing up for other these other housing types, as potential home buyers cannot compete against developers' units built based on the minimum requirements of the Ontario Building Code - small combined living/dining/kitchens, tiny bedrooms, small windows, narrow/long corridors and little or no storage. Continuing to permit these units will perpetuate housing that cannot appeal to any other demographic beyond students. Sandy Hill refuses to become a student ghetto.

In this context, ASH offers the following comments and suggestions:

1. In the Planning Rationale, it is stated that "*the proposed development meets the intent and purpose of the Official Plan policies for the General Urban Area designation by proposing a permitted residential use that will contribute to the provision of housing in Sandy Hill*". This proposed development, and the majority of those we have seen in Sandy Hill since 2012, only provides housing for one demographic – students. In our view, this development does not meet the test of “provision of housing” as cumulatively, it is not contributing to a range of adequate housing for all potential residents of Sandy Hill. It therefore does not meet the intent and purpose of the Official Plan. For the same reasons noted above, the development does not meet the intent of the Sandy Hill Secondary Plan as it fails:
 - “To preserve and enhance Sandy Hill as an attractive residential neighbourhood, especially for family living.
 - To provide for a broad range of socio-economic groups.
 - To accept a modest increase in population, primarily as a way of housing some of the growth in the Central Area labour force.”
2. ASH rejects the developer’s intensification argument – Sandy Hill is already one of the densest neighbourhoods in the City of Ottawa. As we have described above, our neighbourhood has been the subject of considerable densification lately and this has brought about a considerable number of detrimental consequences. We are not against smart development, which often includes densification, but the transition needs to be gradual and well-managed, and this has not been the case for our neighbourhood.
3. The proposed development abuts a Heritage Conservation District and sits across from a Category 1 building to the north. It is ASH’s contention that an enormous opportunity is being missed by the mundane design presented. With respect to the Official Plan, 2003, we would like to note that development “*must be compatible with the existing community character so that it enhances and builds upon desirable patterns of built form and open space*”. This building is a far cry from this vision. We strongly object to its “*playful staggering of punched windows at the corners contrasted with a simple stacked punch window grid*”, which is of no design interest.

In addition, the recommendation of the Heritage planner that the new build pick up at least some historical elements of the existing building, including its string courses, stone sills and stone elements, has been ignored. The Heritage planner also recommended that the entrance should be



placed in the middle of the building's north-facing side, as is the case for all other buildings on the street, including the existing building and 251 Besserer. To be concrete, we are looking for some sympathy in design with the building across the street on the north side, the single-family home directly to the east and the similar housing along the street, and the abutting homes in the Heritage Conservation District on the south side.

4. ASH rejects the proposed unit mix – the Official Plan states that the design should “*accommodate the needs of a range of people of different incomes and lifestyles at various stages in the life cycle.*” This development is a 99-unit, 119-bedroom building aimed specifically at students. The greater need in Sandy Hill is for rental or owned “missing middle” housing for demographics beyond university student age. We recommend a higher count of 2- to 3-bedroom, and units with larger living and eating space footprints.
5. Setbacks and height: ASH strongly rejects the proposed height of the building, as it is almost 10 metres above the limit of 19 metres - an increase of over 50%. This building needs to remain at 9 storeys to ensure a transition from the higher buildings west on Besserer. On the minimum setbacks, ASH contents that with an adjustment in the building size, it would be very easy to meet the minimum front, corner and side-yard setback requirements.
6. ASH does not support zero parking for tenants, and notes that the initially planned 25 parking spaces have been removed since the drawings provided for the pre-consultation, with no credible rationale. Certainly the statement “No tenant parking is provided, consistent with the area modal shares as a TOD site and recent Ward 12 development trends” cannot be supported by evidence. TOD areas do not prohibit providing some parking. And we would need some concrete evidence that “recent Ward 12 development trends” also demonstrate the need for no parking – this is strictly untrue. In fact, we would contend that due to the commercial and cultural businesses in proximity to this building, as well as the Byward Market, the developer could use paid underground parking to their advantage.

The traffic study examines parking spot availability along the full length of Besserer Ave. – which is at least 1 km long. It notes only 19 on-street parking spots for overnight parking, out of 101 available spots. This is completely inadequate for the number of potential residents in the proposed building, and unreasonable when, as we propose, this building be designed to accommodate a range of socio-economic groups and demographics. Evenings and late afternoons will be especially problematic, as well as in winter-time. It will unavoidably lead to more traffic and congestion on Besserer. The lack of residential parking will also affect visitors to the neighbourhood who wish to use street parking. For example, there are many visitors to the Bytowne Cinema or the Ottawa Little Theatre who will not be able to park.

7. ASH does not support the roof-top amenity space. The Noise Study prepared for the application indicates that decibel ranges from traffic are above recommended levels and that any use of the terrace would require considerable sound barrier construction. Without this construction (and the 1m setback for a safety fence) it is unrealistic to think that this space will be attractive as an amenity space. We suggest the proponent reduce the building footprint to include greater on-ground amenity and green space instead.
8. The proposed building needs more green space to benefit tenants and increase permeability. The roof of the visitor parking garage cannot be considered a green roof/space; it is made up of



considerable paved area and 4 large concrete planters. A true green roof is built to include a substrate from which to grow plants, including grass. The new residents and their pets as well will need natural space of their own to provide respite in order to thrive. We suggest that the developer provide some sort of green barrier (trees) between the building and King Edward, to reduce noise, exhaust and dust pollution. It would also be desirable for there to be as much permeability around the building as possible such as pathways, etc. It would be beneficial for the residents to permit access to a treed area on the east side, for at least the first floor.

9. Due to the on-going issues with garbage management and noise from low-rise apartment buildings in our neighbourhood, ASH recommends that the developer be required by the City to provide 24-hour on-site building management service and private garbage pick-up.

There have been a number of comments from concerned residents living close by. Therefore, ASH requests a public meeting on the application for 250 Besserer.

We trust you will agree that with some adjustments, this building can have a positive outcome for the current and future residents of Sandy Hill. Its design and parking provisions can easily be amended to attract long-term, responsible tenants from a range of demographics, as well as contribute to the character and quality of life in Sandy Hill. We look forward to seeing the next iteration of the development application, and plans.

Please ensure that the developer is provided a full copy of our comments, and do not hesitate to contact ASH with any questions you may have.

Yours sincerely,

Susan Young
President, Action Sandy Hill

cc Mathieu Fleury, Councillor, Ward 12