



January 22, 2020

City of Ottawa
Planning Committee
110 Laurier Ave W
Ottawa, ON K1P 1J1

By email to melody.duffenais@ottawa.ca

Dear Planning Committee,

**Re: File Number: ACS2020-PIE-PS-0002
Zoning By-law Amendment and Site Plan Control
36 Robinson Avenue**

I have been retained by Wendy Duschenes and David Elden to make submissions in opposition to the proposed zoning amendment to 36 Robinson Avenue . Both of my clients live in the Robinson Village neighbourhood and are concerned about the impacts this project will have on the area. I will also be making submissions on the proposal relating to 19, 29, and 134 Robinson Avenue in a separate letter.

My clients' concerns with the proposal at 36 Robinson Avenue are:

- (1) the failure of the proposal to comply with the density requirements of the Sandy Hill Secondary Plan;
- (2) the failure of the proposal to comply with the general provisions of the Sandy Hill Secondary Plan;
- (3) the application of the parking aspects of the Lees Transit Oriented Development Plan to the site;
- (4) the need for resident parking minimums in Robinson Village; and
- (5) The lack of transition, setbacks, and general overbuilt form of the proposed development.

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Sandy Hill Secondary Plan – Density Requirements

The proposal is not in compliance with the Sandy Hill Secondary Plan.

The plan sets a maximum height of eight storeys and this proposal seeks to develop a building with nine storeys. Staff's explanation is that the existing zoning permits 27 m in height, but that does not justify the non-conformance with the Secondary Plan. It is well settled law that zoning must comply with higher level plans, see subsection 24(1) of the *Planning Act*. Staff seems to suggest that the zoning of 27 m complies with the Plan but that the same zoning also permits a development that is explicitly over the stated maximum height in Schedule L of the Sandy Hill Secondary Plan. My clients do not agree that such an outcome conforms with the Secondary Plan.

It is important to recall that the eight storey exemption for this site in the Secondary Plan came out of a fact specific OMB settlement. That involved a proposed built form which was less imposing and with fewer units than what is being proposed here. The Secondary Plan shows an eight storey limit as a result of that settlement. It does not permit a nine storey building and therefore this proposal contravenes the Secondary Plan.

Sandy Hill Secondary Plan – General Provisions

My clients also have concerns with the degree to which this development conforms with the general principles set out in section 5.3.1 of the Sandy Hill Secondary Plan. First, clause 1(a) states that it will “preserve and enhance Sandy Hill as an attractive residential neighbourhood, especially for family living.” The proposal here is for small apartments of one bedroom or less. That is not a built form that enhances family living. Next, clause 1(b) sets a policy to “provide for a broad range of socio-economic groups.” This development will attract a large number of people in a uniform socio-economic group. It does not extend the range of housing in the area. Clause 1(c) states that it will “accept a modest increase in population.” This proposal will bring 192 new units to an area that is currently at a low population density. Combined with the other projects on Robinson Avenue which will bring 138 units, the population of Robinson Village will nearly double. That is not a modest increase.

For those reasons my clients submit that the proposal should be rejected for failing to comply with the Sandy Hill Secondary Plan.

Lees Transit Oriented Development Plan

The Transit Oriented Development Plans for Lees, Hurdman, Tremblay, St. Laurent, Cyrville and Blair were approved on January 22, 2014. The Lees Plan envisages the area in which 36 Robinson is located as a residential use area. That plan formed the background for the 2016 Minimum Parking Standards Review, which resulted in the current parking provisions in sections 101 through 105 of the Zoning Bylaw. The transit aspect of those provisions is reflected in the areas on the Schedule 1A map

that reflect parking minimum ranges. Robinson Village is in Area X, which has a minimum of 0.5 spaces per unit. It was explicitly excluded from Area Z, which waived the minimum requirements for parking spaces.

Staff say that “the recommended parking reduction is consistent with Area Z parking.” The 2016 decision to exclude Robinson Village from Area Z, and impose a reasonable minimum parking requirement, was based in fact and was a sound policy decision that ought not be reversed here. Robinson Village is a unique area that is not as connected to Lees Station as other areas in the Transit Oriented Development Plan area.

Parking Minimums Required

Robinson Village is an amenity dessert with limited access to services. There is no grocery store within a 15 minute walk. There are no doctors or other essential service providers nearby. There is one long road into the area and one graded walking trail. While Lees Station is a relatively short walk away, it is not an easy walk. It involves changes in grade, and crossing Highway 417. It is likely that many residents will desire a personal vehicle if they decide to live in Robinson Village.

The parking proposed here is shared across four proposed developments. It consists of 59 residential parking spots (53 here and 2 at each of the other three proposed towers) for 330 units (192 here and 46 at each of the other three proposed towers). That is a rate of 0.18, well below the 0.5 required by section 101 of the bylaw.

The impact of having insufficient parking for the reasonably expected number of cars is felt by the other residents in the area. There is not a great deal of private parking in the area for residents of this development to purchase. The practical impact is that people will find places to put their vehicles and that will negatively impact the neighbourhood.

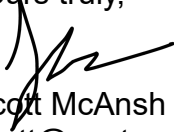
My clients support the general reduction in parking minimum standards in the City of Ottawa. But this is not an area that has the amenities to properly support a car-free lifestyle and more on site parking is required for this project.

Built Form

Finally, my clients have concerns with the built form proposed. There are no significant stepbacks proposed for the building, which will result in a monolithic nine storey wall. There is also no planned transition from the site to the neighbouring stable community of townhouses, or to the adjoining lots zoned for a lower maximum height. The net result is a building that does not conform to, or fit well in, the existing community.

I am happy to answer any questions you may have about our position at the meeting of the Committee tomorrow morning.

Yours truly,

A handwritten signature in black ink, appearing to read 'Scott McAnsh', written over a thin horizontal line.

Scott McAnsh
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