**Preston-Carling District Secondary Plan (File No.: D01-01-14-0005)**

Comments from the Civic Hospital Neighbourhood Association (CHNA)

The Civic Hospital Neighbourhood Association (CHNA) has a number of overall comments on the draft Preston-Carling District Secondary Plan and the consultations process, as well as specific comments and questions on various sections and clauses within the plan.

Our overall, general comments on process and content are as follows:

**Process:**

This Secondary Plan is a crucial document for CHNA as its implementation will permanently affect the character of our community. The review of the actual text (the “*devil in the details*”) is at the end of a very long community development process, yet, the final consultation activity seems rushed as it required “Herculean” efforts on the part of CHNA and other community associations to provide a well-considered response:

* The consultations process on the Secondary Plan is onerous, in particular for community associations and other volunteer organizations that do not have dedicated, paid staff to interpret, review and assess the implications of these documents. Receiving the draft document for the first time in late April with a deadline to provide comments by mid-May has been a challenge.
* The process for comparing the language in the new Preston-Carling Secondary Plan with the language in the old Preston-Champagne Secondary Plan would have been easier had the Planning and Growth Management Department created a special “consultation document” that not only included the new text, but also showed the text that was being adjusted or removed from the previous Official Plan. Without such a document, community associations had to simultaneously review two documents with different contexts and different boundaries, compare one to the other, and try to interpret why the change was proposed. This is an unnecessary burden on residents.

**Content:**

CHNA finds some of the language in the Preston-Carling Secondary Plan unclear and/or difficult to interpret. This runs counter to Planning and Development Chair Peter Hume’s requirement that City documents bring “certainty” to the planning process. We have identified clauses or phrases requiring clarification or explanation so that the document can be improved to provide the desired “certainty”.

CHNA continues to **strongly oppose the excessive height** for the buildings in the Preston-Carling district as we believe that the proposed heights are generally too high and are getting higher as developers privately lobby the City to add more storeys. The history of “Little Italy” is characterized by the word “little”. It is historically a “small” community that prides itself on its Italian heritage and its vibrant, character-rich environment. By surrounding the existing community with enormous condominiums, the city would ensure that the character of the neighbourhood will be overwhelmed as existing buildings will be dominated by the new, excessively tall structures and the streets will be deluged with the associated excessive increase in vehicular traffic.

Little Italy has historically been a ‘family” community and CHNA **recommends that the city** **include more** **family-friendly housing options**  – options such as the low-rise units being developed by Campanale Homes for its Longfield’s Station (called The Station), which includes **townhomes, terrace homes as well as condominiums**.

The Preston-Carling district has been neglected by the City of Ottawa for decades (witness the derelict state of Ev Tremblay Park). However, now that the city has designated this district as an intensification node, the City is trying to assuage opposition with promises of enhancements to the public realm. CHNA **is not convinced that the public realm enhancements will ever be actioned** and is taking a “wait and see” approach until the city delivers resources (and not just promises) to the district.

Considering the scope and the scale of development planned in and around the Preston-Carling district, CHNA strongly recommends **an area-wide traffic study** so mitigation measures can be put in place **before traffic becomes even more problematic**.

**Detailed Comments:**

Part B 2, c. I, last bullet *(Page 4)*

This clause removes the following sentence from the Preston-Champagne Secondary Plan: “*Ev Tremblay Park will be expanded through the provisions of the Parklands By-law should the Humane Society decide to vacate their building*”.

* CHNA finds this sentence compellingly straightforward as to the policy regarding the future of the Humane Society site in the event that the site was to come onto the market.
* CHNA cannot understand how this straightforward dictum from the Official Plan could have been ignored or how this land sale could have occurred. The community was not advised of any change in policy.
* CHNA assumes that the Humane Society and the developer who ultimately purchased the property (Ashcroft) would have done due diligence and have been aware about this official instruction as would the City’s Planning Department.
* CHNA is submitting an Access to Information request to find out who from the City was involved in circumventing the Official Plan and allowing this transaction to take place.

Schedule A (Page 6)

A two-block area from the Queensway to Beech and Railway to Loretta has been re-designated from “Mixed Use Centre” to “General Urban Area”.

* CHNA requests that Planning and Growth Management Department officials confirm that there are no implications from this re-designation for existing retail (ie: Di Rienzo’s) under the existing and future ownership in the short-term and long-term.

Schedule B (Page 7)

This schedule shows land that has been removed from Schedule M of the Preston-Champagne Secondary Plan.

* CHNA is concerned that the information from Schedule M regarding the hazardous waste sites is no longer part of the Official Plan.
* CHNA requests that the Planning and Growth Management Department clarify the process by which hazardous waste sites are now tracked and managed.

Removal of Mainstreet Designations (Pages 6, 9 & 10)

CHNA is concerned about conflicting messages in this document about mainstreet designations. Schedule A removes mainstreet designations for sections of Preston Street and Carling Avenue. Section 4.0 refers to the Official Plan stating that it designates those street as mainstreets. Section 4.1.1 d discusses the “Traditional Mainstreet” continuing on Preston Street.

* CHNA asks that the document, with respect to these traditional mainstreets be made clear.
* CHNA is also concerned that potential street level retail, which is desperately needed in our area, will be lost with any removal of all or some of the mainstreet designations and wants clarification from the city as to the locations of the mainstreets, and requests the preservation rather than removal of any designation.

Section 4.1.1 Station Area – Northeast Quadrant (Page 10)

The maximum height for this quadrant has been increased and is now set at 55 storeys. This is well above the 40-storey maximum height recommended by George Dark in the Strategic Directions Report accepted by City Council. Building height at the Dow Honda site was set to a maximum of 40 storeys in the Strategic Directions Report. However, the developer immediately began asking for 48 storeys.  Now the developer is asking for, and receiving, 55 storey zoning.

Amendment 150, Item 40 of the Official Plan says “The corresponding storey height for a residential use is generally three metres, and for other uses is generally four metres, while at-grade uses may have higher storey heights. “  The term “generally” makes the four-metre storey height only a loose suggestion rather than a firm maximum.  This has enormous implications for the community.

This Secondary Plan seems to be assuming that all new buildings will be residential buildings with 3-metre storey heights, thus giving us buildings with heights of 165 metres. However, because of the uncertainty around storeys versus metres, a 55-storey building at the corner of Preston and Carling could be much taller than that. The 5th tallest building in Toronto (and in Canada), the TD Canada Trust Tower, Brookfield Place is only 53 storeys, but with its spire, it is 260 metres. The Bank of America Tower in New York City is 54 storeys, but is 366 metres with its spire and 288 metres not including the spire. It is taller than any building in Canada!!

Currently, Ottawa’s tallest building is Place de Ville at 112 metres, significantly taller than the 92 metre Peace Tower.  A 260-metre building is more than twice that height and a 366-metre building would be more than 3 times that height. Either would be completely out of context with the Preston-Carling district and inappropriate with regard to respecting the prominence of the Peace Tower.

Two applications have been submitted for buildings at 505 Preston and 845 Carling, while, to our knowledge, the property at the north-west corner of Preston-Carling has no development application at this time.  While 505 Preston and 845 Carling are generally using a 3-metre storey height, there is no guarantee that those projects will go through to completion. If those projects fail, the “loose suggestion” of a 3 or 4-metre storey height with a 55-storey maximum will be on the books and “hanging over our heads” for the next round of development. Thus, that next round of development could feature as many as three mega-buildings with 4-metre-plus storey heights resulting in buildings much higher than the current planned height of 145 metres for 505 Preston.

In discussions with City Planning Staff at an Information Session on May 14th about the 2014 Zoning Review, they informed CHNA that the zoning proposed in the review is described using maximum number of metres rather than by number of storeys. It is puzzling that this Secondary Plan is not using this methodology for defining zoning height. As one City Planner at the Information Session explained, defining height in metres rather than storeys will ensure that developers who want higher storeys will have to reduce the number of storeys.

With respect to density in the Preston-Carling district, CHNA is convinced that the density to be achieved by these enormous buildings far exceeds the density targets set by the Province. This is a clear signal that our small community is being over-intensified.

The massive height of the buildings envisioned in the Preston and Carling district, even at 40 storeys, presents a huge problem for effective transition to the neighbourhood.  Two-storey residential houses are potentially two blocks away from some of the tallest buildings in Canada!!  It is therefore impossible to have respectful transition into a neighbourhood when the starting point is 40+ storeys. Is this the vision for “Little Italy” that the City of Ottawa is proposing?

In conclusion, as CHNA is convinced that a 40-storey limit is too high for our community, and that any further increase is unacceptable. In addition, because the height of each storey is not specified, the maximum height of the building is uncertain.

* CHNA strongly opposes this further increase in height to 55-storey maximum;
* CHNA demands an explanation as to why the zoning is now set at 55 storeys, which is contrary to the recommendations in the Strategic Directions report endorsed by City Council;
* CHNA wants to know why residents haven’t been consulted as the city and developers engage in “zoning up-creep”.
* CHNA requires an assessment of the implications around additional traffic in our neighbourhood as a result of the “zoning up-creep”.
* CHNA stresses that the buildings allowed by this plan will be ridiculously out of proportion with the neighbourhood. As we assume the City has done its due diligence, the CHNA demands to see the assessment of the benefits to the community behind this zoning increase.
* CHNA recommends that the Secondary Plan zoning descriptions include a maximum height in metres or a maximum height per storey in metres, which is **consistent with the approach in the 2014 Zoning Review** which specifies building heights in metres.
* CHNA will be asking City Staff for a comparison of the density targets for the Preston-Carling district with the density that would be achieved with the proposed zoning.

Section 4.1.1. g (Page 10)

This clause proposes a height of 9 storeys on Carling Avenue. The document does not describe the height of each storey, leaving uncertainty as to the real height of the buildings. As well, the proposed 9-storey designation does not provide for a transition down to the existing homes west of Bayswater Avenue and north of Sherwood Drive.

* CHNA strongly opposes the increase to the 9-storey height, as we believe that the zoning for Carling Avenue between Loretta and Bayswater should be 4 storeys, which provides for a meaningful transition down to the 2-storey neighbourhood homes.
* CHNA strongly recommends that the text related to the “sympathetic built form” be strengthened to provide assurances that future designs will be compatible with the neighbourhood.
* CHNA strongly recommends that zoning language provide details as to the “real height” of the building limits and strongly recommends that all secondary plans and zoning consistently include a maximum height in metres.

Section 4.1.1. h (Page 10)

This clause proposes a height of 9 storeys at the corner of Hickory and Loretta.

* CHNA vigorously objects to that height.
* CHNA supports a maximum height of 6 storeys on that site.
* CHNA strongly recommends that all zoning consistently include a maximum height in metres.

Section 4.1.1. i (Page 11)

This clause is not consistent with other maps in which the 6-storey zoning was proposed for the south side of Beech Street between Champagne Avenue and Loretta Avenue. This wording appears to propose 6 storeys for both sides of Beech Street, which would create a canyon effect on this small, local street.

* CHNA would like clarification on this bullet.
* CHNA strongly objects to 6-storey zoning on either side of Beech Street between Champagne and Loretta.

Section 4.1.1. j (Page 11)

This Secondary Plan document and the Public Realm and Mobility Study both stress the importance of park and green spaces. Yet, the city proposes that the largest and most significant greenspace in the area, Queen Juliana Park, be slated for intensive development under this plan. CHNA notes that other federal lands surrounding Dow’s Lake are walking and park spaces, but there is a lack of larger public “playing fields” in the area. Queen Juliana Park has also been traditionally used for events such as Pow-Wows, Fairs, Charity Runs and Walkathons (Start and Finish Lines) and its loss would be a big blow to the community. CHNA believes that, with the increase of residents living in the area due to intensification, and the danger of never-ending “zoning up-creep”, park and green space is even more important today than it has been in the past.

* CHNA strongly opposes the closing of Queen Juliana Park and strongly opposes its development into an intensified work & residential block.
* Unless the City demonstrates concrete actions to preserve and enhance existing park and greenspaces, and until the City develops and releases the Greenspace Master Plan, references throughout this document (and others) to City support for “public parks” cannot be taken seriously. The City has lost all credibility re: its commitment to greenspace in the Preston-Carling district.
* CHNA also strongly recommends that the City of Ottawa, in particular elected officials, look to the example of a Toronto City Councillor who fought to keep a parcel of federal land as a park, rather than be developed as condominiums (“*How a Toronto  Councillor fights for her constituents*”). The parallels with Queen Juliana Park are significant. The link to the story can be found here: <http://toronto.ctvnews.ca/set-downsview-free-petition-urges-ottawa-to-hand-over-park-to-city-1.1786006>

Section 4.1.2 c (Page 11)

There is no mention of setback from the street, only from the abutting properties.

* CHNA recommends that the City include more specific, clear language concerning street setbacks to bring more certainty to this very important design consideration that has enormous impact on neighbourhood character, liveability and landscaping.

Secrion 4.1.2 (Page 11)

There are no references to podiums or podium heights as methods to prevent the canyon effect that is very evident in Kitchissippi Ward at the Convent development on Richmond Road.

* CHNA strongly recommends minimum step-backs of 2.5 metres to define the building podium from the towers.
* CHNA recommends 2-storey podiums, to a maximum of 7 metres.

Section 4.1.3 c (Page 12)

CHNA supports the city’s intention to encourage a “major grocery store” in the area.

* CHNA recommends that the language of this clause be strengthened; replacing the word “encourage” with the work “require” to ensure the district is supplied with this essential service.

Section 4.1.7 (Page 13)

The first sentence in this section provides the rationale for saving and enhancing Queen Juliana Park, as it states: “*As the Preston-Carling District intensifies, there will be an increased demand on the provision of open spaces, including parks and urban spaces*.”

* CHNA strongly believes that Queen Juliana Park should be included as an important location for an open space in the Preston-Carling district.

Section 4.1.7 a (Page 13)

CHNA notes that the language in this clause is similar to a clause from the Preston-Champagne Secondary Plan that appears to have been contravened when the Humane Society property became available for purchase.

* Based on the previous adherence to the area’s Secondary Plan, CHNA requests that the City put in place measures to ensure that the directives in the Preston-Carling Secondary Plan are enforced and to articulate these measures in the document.

Section 4.2.1 b (Page 14)

CHNA notes that the text does not specify a limit to the number of floors in a podium.

* CHNA assumes this is an oversight and recommends 2-storey podiums to a maximum of 7 metres.

Section 4.2.1 e (Page 14)

CHNA notes that the document specifies a 20-metre separation between high-rise towers (10-30 storeys), which is less than the 24 metres in the “Transit Oriented Development Plans, Train, St. Laurent, Cyrville.”

* CHNA strongly recommends that the separation allowance between high-rise towers (10 storeys and higher) for the Preston-Carling Secondary Plan be consistent with other areas of the city and therefore be set at 24 metres.

CHNA also notes that the language in the “Transit Oriented Development Plans, Train, St. Laurent, Cyrville” document states: “*Sites which cannot meet the minimum tower separation requirements are not appropriate for tall buildings.”*

* CHNA strongly recommends that this language be added to the Preston-Carling Secondary Plan.

Section 4.2.2 (Page 14)

Besides the design characteristics articulated in this section, CHNA believed that buildings adjacent to the LRT station should have special design characteristics that include physical connections and public access to the transit station, including tunnels or escalators. By documenting this design requirement in the Secondary Plan, the City will be making a concrete commitment to this goal and contributing to the enhancement of the public realm.

CHNA also points out that the city has an obligation to ensure that developers offer a wide range of housing options to create vibrant and healthy communities. We would like to see buildings that offer more units that will appeal to families so that the mix of residents moving into our community somewhat reflects the family orientation of the existing community.

* CHNA recommends that the City “raise the bar” in terms of building design adjacent to the LRT stations by including a requirement that developers must commit to designing and maintaining well-designed public access to the station platform.
* CHNA also recommends that the City put measures in place to require developers to offer a wide range of housing options so families will be encouraged to move to the Preston-Carling area.

Section 4.2.3 a (Page 15)

This section applies to buildings up to 9 storeys. The method used to set the height of the “middle portion” of the building obscures the intention of this clause, which is contradictory to the City’s and Planning and Development Chair Peter Hume’s desire to bring certainty to city planning. Our estimate is that for buildings facing Carling Avenue, this rule would allow 9-storey middle portions of buildings, which are, in our opinion, too high. This rule would also allow the middle portions of buildings to be 6-storeys high on Sherwood Drive and 3-storeys high on Loretta Avenue.

* CHNA strongly recommends that the City edit this clause to both make it more transparent and at the same time lower the allowable heights.

Section 4.2.3 b (Page 15)

This section includes a very general statement about setbacks re: mid-rise buildings which states: “explore design techniques such as setbacks and step backs to avoid the canyon effect along the public street“. This applies only to mid-rise buildings up to 9 storeys.

* CHNA recommends that the City include more specific language concerning setbacks to bring more certainty to this very important design consideration that has enormous impact on neighbourhood character, liveability and landscaping.

Section 4.2.4 a (Page 15)

* CHNA would like clarification as to how this clause applies to Preston Street, given that this plan is also removing the mainstreet designation from Preston Street near Carling Avenue. Will buildings where the mainstreet designation appears to be removed not be required to follow these policies?

Section 4.2.5 e (Page 16)

* CHNA strongly supports this section related to the neighbourhood line.

Section 5.1.1 d (Page 17)

CHNA would like more detail on the background behind this clause and the possibility of similar community benefits for the portion of the Civic Hospital neighbourhood included in the Preston-Carling district.

* Has Preston Street and the Queensway been officially designated the “north gateway” to Little Italy? CHNA endorses the concept of a North Gateway.
* CHNA requests confirmation that the City has identified funding for the urban square.
* Has there been any consideration for an entry gateway to the Civic Hospital community at the Sherwood Drive and Bayswater Avenue? CHNA encourages the inclusion of a similar gateway concept for the Civic Hospital neighbourhood.
* Has the city considered a small urban courtyard or parkette at the south east corner of Bayswater Avenue and Sherwood Drive? CHNA encourages the City to identify funding for a small urban park of parkette at this location.

Section 5.2.3 c & d (Page 19)

CHNA agrees that the City should “plan for the improvement and expansion of play facilities”… “ to ensure families have safe, accessible and beautiful space to play in”. We also agree that the City should “ensure that the public realm of the Preston-Carling District … support(s) the continued success of the traditional events “.

CHNA cannot understand how the City can acknowledge and decry the lack of greenspace in the Preston District while simultaneously endorsing the development of one of the most used and beloved parks in the district - Queen Juliana Park. CHNA is perplexed and infuriated that the City is lobbying to shut down Queen Juliana Park, the only “open space” field in the Preston-Carling district. CHNA encourages the City to envision a design for the greenspace around Dow’s Lake, including Queen Juliana Park that includes both formal gardens and informal open fields similar to the kinds of greenspace found in Regent’s Park in the centre of London UK and Central Park in the centre of NYC. Queen Juliana Park already serves an important function as the only Preston-Carling space with a field big enough for team sports such as Ultimate Frisbee. It is also traditionally home to numerous fairs, pow-wows, and start/finish lines for walkathons.

* CHNA strongly opposes closing of Queen Juliana Park as per our comments on Section 4.1.1.

Section 7.0 a (Page 20)

CHNA is supportive of the City’s objective to increase affordable housing in our community and throughout Ottawa. However, CHNA is of the opinion that the Preston-Carling District is poorly supported by the existing parks which are either too small (McCann Park) or have been shamefully neglected (Ev Tremblay Park). It would be unconscionable for the City to continue to encourage residents to move to a district with disgraceful, even dangerous, city parks and greenspaces on which it is encouraging development.

* CHNA does not, at this time, support the recommendation for the allocation of Section 37 community benefits directed at affordable housing until sufficient park and greenspace has been guaranteed by the City (ie: Queen Juliana Park) and the district’s parks have been expanded and enhanced. (Please note: CHNA is aware that Section 9.4.1 a directs some funds towards parks.)

Schedule B: Heights and Tower Location Plan

* CHNA opposes 9-storey zoning along Carling Avenue. We believe that the zoning from the Bayswater to Loretta segment of the street should be set at a 4-storey maximum to ensure a meaningful transition into the 2-storey residential homes in the community.
* CHNA also recommends that the City specify the zoning by articulating the height in metres rather than storeys to eliminate uncertainty as to what the zoning designations mean.
* CHNA strongly opposes the 9-storey zoning height at the north-east corner of Hickory and Loretta. We recommend 6 storeys as the appropriate height for this corner.
* CHNA strongly recommends that the maximum building height of 31+ be replace by **maximum building height of 40 storeys**. CHNA argues that over 40 storeys is not only inappropriately high for this district, but also goes beyond the Strategic Direction Report (George Dark’s) recommendation of a maximum of 40 storeys.
* CHNA would like the City to articulate the logic behind the 55-storey building height, as it is not possible to provide meaningful comments regarding the change without knowing the rationale behind it. CHNA demands that the City share its assessment of the impact of the “zoning up-creep” on our community.
* CHNA believes that City of Ottawa planners should investigate more innovative approaches to intensification that are appropriate to downtown neighbourhoods. For example, Ottawa should consider 4 or 6-storeys as the development height limit along neighbourhood lines as per the forward-looking approach being discussed in the City of Toronto where 6-storeys has been identified as appropriate to allowing a “gentle transition” to low-rise residential buildings.

Prepared by: CHNA, May 15, 2014