

Community Concerns

Proposed Development at 340 Parkdale Avenue, Hintonburg

Application D01-01-26-0002 — Taggart Realty Management — 38 Storeys, 465 Units

This document sets out the three primary concerns of the Resident Working Group of Parkdale Market Lofts (320 Parkdale Avenue and 45 Spencer Street) regarding the proposed 38-storey (121m) tower development at 340 Parkdale Avenue. For each concern it explains: (A) what the concern is, (B) why it is a concern, and (C) what the Resident Working Group is asking the City of Ottawa to consider changing.

The Resident Working Group supports intensification on this site and recognizes its suitability for high-rise development; however, the scale of that intensification must remain consistent with Official Plan policies requiring compatibility and gradual transition. Our specific concerns relate to Tower Height relationship to the neighbourhood, Transition Quality, Urban Design Compatibility, Shadow and Visual Impact, and Traffic Impact including the garage access configuration onto Spencer Street.

It should be noted that the Applicant's Proposal refers to 45 Spencer Street as an 8 storey residential building. This is not correct. 45 Spencer Street (at Spencer and Hamilton) is a 4 storey residential building (3 storeys and a stepped back 4th storey) comprising 16 Condo Units and one commercial space at ground level. The 8 storey building at Parkdale and Spencer is 320 Parkdale Avenue which contains 39 Condo Units and one commercial space at ground level.

Concern 1 — Density, Height, and Transition

1a. The proposed height of 38 storeys exceeds what the City's planning framework supports or anticipates at this location and does not conform to the Official Plan's policies requiring compatibility, proportional intensification, and gradual transition.

A — What is the concern?

The proposal seeks permission for a 38-storey Tower with a 6-8 storey podium on all four street faces – Spencer/Hamilton/Armstrong and Parkdale. The Wellington Street West Secondary Plan (WSWSP) and Community Design Plan(CDP) establish the intended height, scale, and transition framework for this area and continue to provide important guidance regarding appropriate built form and compatibility. These Plans were multi-years in the making with extensive community consultation and input. Furthermore, City Council has ensured they are still very much relevant by including Secondary Plans as a schedule to the new Official Plan. Overriding this height restriction requires amendments to the Wellington Street West Secondary Plan, the Official Plan and the Zoning Bylaw - significant planning steps that must be affirmatively justified.

The WSWSP and CDP state the following for the area between Spencer/Wellington/Holland and Parkdale;

“redevelopment shall have a maximum of eight stories or 27 meter buildings. This height will provide a transition in character between the taller built forms from Scott St. to Spencer St. and the traditional Main Street built form of Wellington Street. It will further ensure appropriate scale, sun and sky exposure to surrounding areas.” (N.B. the height limit for the site was subsequently modified by an OMB Tribunal, however, the transition component is still very relevant).

The Applicant’s submission has suggested that the Wellington St. West Secondary Plan’s policy framework and zoning applicable to the site are ‘not conducive to supporting the proposed redevelopment.’ Even though the Provincial Planning Statement and the new Official Plan call for greater intensification in this area, this does not override the very sound, well thought out and community supported urban planning and design principles contained within this plan. These principles are still valid and are intended to be used to meet the very clear vision articulated by and still representative of the community’s wishes.

The block sits within an H2 Hub designation that supports intensification near the Tunney’s Pasture O-Train station. However, the Official Plan’s own framework directs the tallest buildings closest to the station core, with building heights stepping down as distance from the station increases. The Urban Designations Section of the Official Plan states:

6.1.1.3) Development within the Hub:

- a) Shall direct the highest density close to the transit station or stop so that transit is the most accessible means of mobility to the greatest number of people.

Further, the Transects Section states:

5.2.3.1)

- d) On parcels that are within a designated hub but not covered by a local plan, high rise buildings shall only be permitted on parcels of sufficient size to allow a transition in built form massing, and their height shall be lowest at the outer edge of the hub and tallest at the centre of the hub and near a rapid transit station.

This Hub is covered by a local plan, the WSWSP which is consistent with the Official Plan’s concept of having a transition in scale and character within the Hub.

B — Why is it a concern?

340 Parkdale is not at the Tunney’s Pasture station core. It is embedded in a mixed low-rise and mid-rise neighbourhood on three sides. The Tunney’s Pasture federal campus — immediately beside the station — is being planned for redevelopment as a major transit-oriented community with up to 9,000 residential units. Other than the very west edge, the campus is not within close proximity to low and mid-rise residential and as such, is the logical location for the greatest heights in this Hub. The Tunney’s Pasture plans (Figure 1) to date identify:

- High density towers of 21-40 stories located nearest to the LRT station.
- 10-20 stories in the core.
- 3-4 stories along the western edge.

The LRT station is 50 meters from the Tunney’s Pasture southern property line. The proposed development is located 600 meters southeast of the Tunney’s Pasture federal employment node

and rapid transit station (as used by the Ontario Municipal Tribunal hearing). The Applicant has identified that this site is 350 metres from the LRT station, however, it is not known what the basis of this distance calculation is.

Recent high-rise development in the Parkdale/Tunney's Pasture Area has generally concentrated the tallest buildings closest to the Tunney's Pasture transit station and along the Scott St. Corridor. Buildings ranging from approximately 29 to 33 stories have been approved or constructed north of Scott Street where proximity to rapid transit and major employment lands is greatest. As development transitions South of Scott St. towards established residential neighborhoods, a corresponding step-down in height is typically expected to ensure compatibility and appropriate transition.

In conclusion, the proposed 38-storey tower is not in compliance with the above-noted policies, specifically with the step-down framework the Official Plan establishes for developments within Hubs. The Proposal's significant massing is out of both scale and character with the established low and mid-rise neighborhood that surrounds it.

C. What we are asking the City to consider

- **That the City request the Applicant to provide a specific justification for why 38 storeys is appropriate at this location within the Hub, given the planning framework's direction to locate the tallest buildings closest to the station core and given the extensive and intensive future residential development planned for the Tunney's Pasture area combined with the already existing high rise residential developments north of Scott Street on Parkdale.**
- **That the City establish a maximum height of 18 storeys (as previously approved as an appropriate height by the OMB and already permitted within the existing zoning) including a podium built-form which meets the Official Plan's step-back design guidelines – see 1b and c), as a more proportionate response that achieves meaningful intensification while respecting the neighbourhood's scale and character.**

1b. The proposal does not provide an adequate transition to the surrounding neighbourhood

A — What is the concern?

Policy 20 of the Wellington Street West Secondary Plan exists specifically to protect the transition from the taller buildings near Scott Street to the Mainstreet scale of Wellington Street West. The City's Official Plan has numerous planning and urban design policies to ensure an appropriate transition of new mid- and high-rise development within its surrounding area. The policies relevant to this development are as follows:

5.2.1 Enhance or establish an urban pattern of built form, site design and mix of uses.

3)b) Limits on building heights and massing as per the underlying functional designation, and the separation of tower elements, established through secondary plans or area specific policy, the functional designations and urban design policies in Sub-Section 4.6, or as a result of the application of heritage conservation policies in subsection 4.5.

5.2.3 Within Hubs, permitted building heights are as follows:

1)a) up to a 300-metre radius or 400 meters walking distance, whichever is greatest, of an existing or planned rapid transit station, not less than 3 storeys and up to high rise.

1)c) Outside the area described by Policy a), not less than 3 storeys and up to a high-rise where the parcel is of sufficient size to allow for a transition in built form massing. (*N.B. This property is 600 meters from the LRT station*)

3) Along Minor Corridors (*N.B. Parkdale Avenue is designated a Minor Corridor*), permitted building heights are as follows, subject to appropriate height transitions and setbacks:

a) Generally, not less than 2 storeys and in the maximum height range of between 4 to 6 storeys, except where a secondary plan or area specific policy specifies different heights.

6.5 Ensure effective site planning that supports the objectives of corridor, hubs, neighborhoods and the character of our villages and rural landscapes:

2) Development in hubs and corridors shall respond to context, transect area and overlay policies. The development should generally be located to frame the adjacent street., park or green space, and should provide an appropriate set back within the street context, with clearly visible main entrances from public sidewalks.

4.6.6 Enable the sensitive integration of low- rise, mid-rise and high-rise buildings to ensure Ottawa meets its intensification targets while considering liveability for all.

1)c) Within a designation that is a target for intensification, specifically:

i) built form transition from a Hub and a surrounding low-rise area (*N.B. Parkdale Avenue and the 4 storey building at 45 Spencer Street*) should occur within the Hub.

The proposed Tower is located in the northwest corner of the site directly across from 45 Spencer St., a 4 storey low-rise condo building. It is stated that the Tower is set back 5.23 metres from Spencer St. and 23.52 meters from the 45 Spencer St. building itself. The Planning Rationale indicates a fixed angular plane is not required; however, the City's high-rise compatibility objectives still require a clear demonstration of appropriate transition to the Spencer St. residential edge. Given the magnitude of height relative to the minimal Spencer-facing setback, the Applicant should provide a transparent, measurable transition analysis (angular plane or equivalent) showing how stepbacks, setbacks, tower placement and or reduced height at the neighborhood edge, achieve compatibility within this established residential context.

ii) Transitions between mid-rise (*N.B. 320 Parkdale Avenue*) and high-rise buildings and adjacent properties designated as Neighbourhood on the B – Series of Schedules, (*N.B. east side of Parkdale Avenue*), will be achieved by providing a gradual change in height and massing, through a stepping down of buildings, and setbacks from the low rise properties, generally guided by the application of an angular plane as may be set out in the zoning bylaw or by other means in accordance with council approved plans and design guidelines.

7) Mid-rise buildings (*N.B. the proposed Podium*) shall be designed to respond to context, and transect area policies and should:

d) provide sufficient setbacks and step backs to:

ii) Avoid a Street Canyon effect. (*N.B. Spencer Street from Parkdale to Hamilton*)

8) High rise buildings shall be designed to respond to context and transect area policies and should be composed of a well-defined base, middle and top. Floor plate size should generally be limited to 750 square meters for residential buildings

The proposal combines a large Tower floor plate (802 m²) with a height of 38 stories. The Official Plan recommends slimmer Tower floor plates (750m²) to reduce perceived bulk, shadow width and skyline impact. A more slender tower form could allow for reductions in height, while maintaining significant residential density and achieving a more compatible transition to the surrounding area, especially within the 45 Spencer St. low-rise residential context.

B — Why is it a concern?

The following summarizes why the proposed development does not meet the requirements of the City's Official Plan in relation to transition and compatibility to the surrounding area:

The proposed 38 storey tower does not conform to the Official Plan's policies requiring a gradual and appropriate transition in height, massing, and scale between high-rise development and adjacent low-rise and mid-rise neighborhoods. The Official Plan is clear that compatibility is achieved through incremental changes in building height and form that respect and relate to the surrounding context. In this case the increase from a previously approved 18-storey tower to a 38-storey tower represents a substantial and disproportionate escalation in height that cannot reasonably be characterized as a gradual transition. The proposed height significantly exceeds both the prevailing mid-rise character of the immediate area and the scale of nearby approved buildings, resulting in a form that is visually dominant and out of proportion with its surroundings. This abrupt change in scale undermines the Official Plan's objectives to ensure that intensification is carefully integrated and sensitive to its context. As proposed the development introduces a level of height and prominence that fails to maintain the planned and orderly transition envisioned by the Official Plan and therefore does not appropriately achieve its compatibility and transition policies. The Applicant's report speaks of maintaining the heritage 'look' of the Carleton Tower. This same urban design principle should be applied to the whole of Hintonburg – retaining its historical 'look and feel'. A 38 storey Tower in the middle of a low to mid-rise neighbourhood within the Hintonburg community does not meet this principle.

The Tunney's Pasture development and the Scott Street Corridor provide the transition buffer the planning framework envisages — the proposed 340 Parkdale which is embedded in a mixed low-rise and mid-rise neighbourhood and being within the Wellington Street West Mainstreet context is not the right place for the full Hub height envelope. The large range of heights provided in the Official Plan and Zoning Bylaw for development within areas designated as Hubs (Low-rise, Mid-rise and High-rise; minimum 3 storeys and maximum 40 storeys)) is precisely there to support the necessary transition and urban design policies of the Official Plan depending upon the contextual environment within which a development is being proposed. Designation within a Hub does not automatically support development at the maximum height permitted. The Official Plan explicitly requires that building height within Hubs be determined based on Site Context, Compatibility and the ability to achieve an appropriate Transition to surrounding areas.

C — What we are asking the City to consider

- **That the City establish a maximum height of 18 storeys (as previously approved as an appropriate height by the OMB and already permitted within the existing zoning) including a podium built-form which meets the Official Plan's step-back design guidelines – see 1b and c), as a more proportionate response that achieves meaningful intensification while respecting the neighbourhood's scale and character.**

- **That with respect to the 45 Spencer Street low-rise residential development, that the Applicant should provide a transparent, measurable transition analysis (angular plane or equivalent) showing how step backs, setbacks, tower placement and or reduced height at the neighborhood edge, will achieve compatibility within this established residential context.**

In further addressing the issue of height and density on this site, the OMB considered the opinion of the City Planner (Mr. Smit) who had supported the proposed 18 storey development and who stated:

“This high-density residential development is located close to transit and is in an area envisaged for high profile residential buildings and will contribute to a greater housing mix and satisfies the density targets.” Further according to Mr. Smit, “the proposed development also satisfies the compatibility and design criteria as well as the transportation and servicing criteria.” Mr. Smit was also of the opinion that the current proposal respects the density that was established through the Community Design Plan and redistributes it into a form that is considered appropriate for the site given its location within a mixed-use centre between a transit station and a traditional Main St. He opined that the development fits well within its physical context and works well among those functions that surround it.

In the decision, the Board itself states: “The Board agrees that it will not be a dominant or overwhelming building within its surrounding context and is a superior development to what an 8-storey development would provide. It is capable of co-existing with what already exists in the area and will not cause any undue adverse impacts on the surrounding area.”

The Board further stated: “In conclusion, the Board is satisfied that the proposed development is consistent with 2014 PPS, conforms to the policies of the city's Official Plan and, with the exception of the prescribed limit for the subject property in the Community Design Plan and Secondary Plan, is appropriate and complementary to Parkdale Park and Parkdale Market; and is generally consistent with the design objectives in the Community Design Plan.”

Since this OMB decision in 2014, the contextual setting of this property has not changed. There still exist the Parkdale Park and Market to the South; low-rise residential to the east; the low-rise heritage conservation site to the West and the low to mid rise residential to the north. Increasing the density on this site to a 6-8 storey stepped-back podium and an 18-storey tower would satisfy both the Provincial Planning Statement and the Official Plan policies towards intensification within this hub. In addition, as it was supported by the OMB on the basis of being: supportive of transit; compatible with its surroundings; generally meeting the design objectives of the community design plan and not being a dominant and overwhelming building within its surrounding context, this lower height and density precisely meets the policies and urban design principles of the City's new Official Plan.

In summary, an 18 storey Tower would:

- Still be clearly a high-residential building
- Still deliver hundreds of units
- Dramatically reduce shadow reach
- Better align with transition expectations, and
- Reduce visual dominance from all surrounding streets and the broader neighbourhood

- **Reduce the Canyon like effect which under the current design will occur on Spencer St., by using setbacks on the podium at floors 3,5,7 and 8 on both Spencer St. and Parkdale Ave. (see Figure 2, a schematic drawing identifying how such step-backs might look).**

This will make the building appear more gradual and less abrupt; more sky would become visible between levels; the upper floors would visually dissolve into the skyline and the perceived height of the podium would be reduced. This is very much in line with accepted urban design principles for mid-rise developments.

The approved OMB development for this site called for a 2-storey height on Parkdale Ave. as an appropriate design to provide an even stronger transition to the low-rise neighborhood directly across Parkdale Avenue. The step-back design identified above would meet this same objective but also allow for greater intensification.

1c. The proposal more than doubles the height approved by the OMB.

A — What is the concern?

The Residents Working Group has obtained the Ontario Municipal Board decision in case numbers PL110686 and PL130794, issued December 2, 2014, by member R. G. M. Makuch following a full contested hearing held July 2, 2014.

That decision approved a maximum height of 18 storeys for the interior portion of this block (Area E of Schedule 333 to Zoning Bylaw 2008- 250), with a carefully graduated profile across the site ranging from two stories at the street fronting elements to 18 stories at the interior northwest corner. The Board also embedded a density cap in the approved Official Plan Amendment, limiting development to a floor space index generally equivalent to an 8-storey building.

The approved graduated height profile across five areas is shown on the attached Figure 3. Area A's height is 2 storeys which is the Parkdale Avenue fronting elements including the Carlton Tavern site; Area B's height is five storeys at the Parkdale Ave. frontage immediately adjacent to 320 Parkdale; AREA C's height is 7 stories; Area D's height is 9 stories; Area E's height is 18 storeys at the interior of the block. This follows the step-back urban design principles contained in the Official Plan.

B. - Why is it a concern?

- The height framework for this block was set not by city policy alone but by an independent tribunal after a full contested hearing at which competing planning evidence

was tested under cross examination. Three specific findings in that decision are directly relevant to the applicant's 38 storey proposal:

- Distance from transit: The Board recorded that the site is approximately 600 meters southeast of the Tunney's Pasture station. This is the OMB's own finding about the site's relationship to transit, made in the context of approving 18 storeys. The proposed development is for a 38-storey tower in the same block.
- Scale finding: The Board found that the approved 18 storey building 'will not be a dominant or overwhelming building within its surrounding context.' The proposed development calls for a building more than twice the height and four times the visual prominence above the Podium.
- The proposed development of 38 storeys is 2 storeys more than TEGA's (the property owner) original 36 storey proposal that was rejected by Planning Committee 6 to 2 in 2011, and 20 storeys more than the OMB ultimately approved after a full contested hearing. The 18-storey approval was reached after four design iterations, extensive Urban Design Review Panel engagement, and city staff recommendation.

The Applicant's Planning Rationale states that "The sub-surface of the site is impacted by contamination resulting from a former industrial use and requires remediation to permit any redevelopment of the site with sensitive land uses (e.g. residential)". Although not explicitly stated by the Applicant, a question which is often heard regarding the contamination is whether the height and density represented in the Proposal is related to the costs of the contamination removal. The Resident Working Group is interested in the policy and technical justification for having to remove the contaminants versus continue with the current and 20-year-old extraction and monitoring system. In addition, the Resident Working Group is interested if the Applicant will be applying for the City's Brownfields Redevelopment Community Improvement Program which financially assists land owners with such sites towards their remediation efforts.

C — What we are asking the City to consider

Maintaining the 18-storey height limit on this site in place of the 38-storey proposal and permitting the 6-8 storey stepped-back podium (as per 1b) along Parkdale Avenue and Spencer Street.

A 38-storey tower dramatically exceeds surrounding building heights; becomes the dominant skyline element; appears as a vertical landmark and the sky becomes the secondary visual element. This represents a fundamental shift in urban scale, not merely an incremental increase in height. At 18 storeys, the tower will feel like a tall neighbor. At 38 storeys the tower feels like a downtown scale building, dominant and visually overwhelming. In urban design terms, Towers in the 35- 40 storey range affect skyline structure; affect shadow reach significantly; affect neighborhood identity and become city scale visual elements not neighbourhood scale elements.

The Shadow Impact as noted above changes significantly between an 18 storey and 38 storey building. In mathematical terms, a 38 storey building casts a 2.1x shadow length of an 18 storey building. This is yet another important consideration in relation to site context compatibility. To understand the real impact on the low-rise and mid-rise residential homes to the north and east

of the site, it is suggested that the City ask the Applicant to prepare a comparative shadow study showing same date/time set for an 18 storey alternative massing and a 'net new shadow' overlay comparing 18 versus 38 storeys.

Figure 4 is a representative schematic which shows the visual difference between an 18 storey and 38 storey building with the same Podium design from the surrounding area. This is not showing the specific proposal site.

Summary Statement

An 18-storey height limit represents the appropriate and supportable level of intensification for this site, as it achieves increased residential density while maintaining conformity with the Official Plan's policies for compatibility, transition, and contextual integration. An 18-storey tower provides a reasonable and proportionate progression in building height relative to the surrounding low and mid-rise context and can be accommodated without creating undue visual dominance, excessive shadow impact, or disruption to the established character of the adjacent neighborhood and public realm. In contrast, the proposed 38 storey tower constitutes a substantial and disproportionate increase in height that is not reflective of a gradual or incremental transition. Its scale significantly exceeds both the existing and planned context and introduces a level of prominence that cannot be effectively mitigated through setbacks or massing alone. As a result, the proposed height undermines the Official Plan's direction to ensure that intensification is carefully integrated and compatible with its surroundings. Limiting development on this site to 18 storeys represents a balanced and policy-consistent outcome that fulfills both intensification and transit supporting objectives while respecting the scale, character, and liveability of the surrounding community. The previously approved 18-storey height represents the appropriate balance between achieving intensification objectives and maintaining compatibility with the surrounding neighbourhood and public realm.

Concern 2 — Traffic Impact

2a. Inadequacy of the Traffic and Emergency Access Analysis

A — *What is the concern?*

The concerns raised in this section are entirely independent of the height and density question. Whether a 38-storey tower or an 18-storey tower is ultimately approved on this block, the traffic and emergency access implications must be properly studied.

The TIA Strategy Report was prepared by Parsons (Project No. 479049-01000), authored by Juan Lavin P.Eng. and authorized by Jake Berube P.Eng., and submitted January 9, 2026. The submitter has reviewed it in full. It is a professionally structured document. Its deficiencies lie not in what it contains but in what it omits — seven specific and serious gaps (covered within Concerns 2 and 3) each of which are documented below with reference to the TIA's own text.

In addition, the extent of vehicle parking to be provided on this site - 4 underground levels creating 322 spaces - in what is intended as a transit supportive development does not seem reasonable and as a result, will have considerable impact on an already broken Parkdale Avenue which is a parking lot not only at peak hours, but often throughout the day. The cited number of 487 bicycle parking spaces which implies a significant level of bicycle usage from this development is also contradictory to the large number of vehicle parking spaces being provided.

The Applicant has stated that this number of parking spaces is a result of having to excavate down 4 levels to remove the contamination. If this level of parking is not required, could the underground levels be used for other purposes as has been effectively done in other countries (e.g. automated cycling storage (e.g. in Japan); hydroponics; storage units (as is now available on this site and which is in demand in the inner core) and any other alternative uses. Has the Applicant considered such alternative uses?

The Parking Ratio for this development is 0.69 spaces per unit. This ratio is generally higher than what is typically provided in transit-oriented developments near rapid LRT stations in Ottawa where parking ratios fall between 0.3 and 0.6 spaces per unit. This would further support the Applicant being asked to look at alternative, innovative uses for the excess underground space resulting from the contamination remediation.

B — Why is it a concern?

Critical Traffic Count Data Is Between Six and Nine Years Old at the Most Affected Intersections

The TIA's traffic count data, listed in Section 2.1.2, includes the following dates for the intersections most directly affected by the proposed Spencer Street garage access:

- Spencer Street / Holland Avenue — counted January 11, 2017 (nine years old)
- Wellington Street / Holland Avenue — counted November 22, 2017 (eight years old)
- Spencer Street / Hamilton Avenue — counted November 23, 2016 (nine years old)
- Armstrong Street / Parkdale Avenue — counted November 20, 2019 (six years old)
- Wellington Street / Parkdale Avenue — counted March 10, 2020 (six years old, during the early COVID-19 period when traffic volumes were materially suppressed)
- Gladstone Avenue / Parkdale Avenue — counted December 5, 2019 (six years old)

Note that there is no traffic count information for the Parkdale Avenue and Spencer Street intersection which will most definitely be impacted by the proposed garage access.

The TIA acknowledges at Section 2.1.2 that “older counts (2016, 2017) were balanced with adjacent newer traffic counts.” Balancing is not a substitute for fresh data. More critically, the TIA's own Section 2.1.2 records that Scott Street was reconfigured from four lanes to two lanes in 2024, with a new eastbound cycle-track. Every one of the older counts was collected before this reconfiguration. Scott Street's lane reduction fundamentally altered traffic distribution across the local network — displacing vehicles that previously used Scott Street onto parallel routes including Spencer Street. The 2016 and 2017 counts at Spencer/Holland and Spencer/Hamilton cannot reliably represent conditions that post-date that reconfiguration. Spencer/Holland and Spencer/Hamilton are the two intersections most directly relevant to the proposed garage access onto Spencer Street, and they are based on the oldest data in the study.

The traffic counts also pre-date the significant increase in high rise development north of Scott St. on Parkdale and the beginning of the LRT. There are three existing developments (The Dale; The Parkdale Collective and Richcraft) which have a total of 560 parking spaces and two proposed towers at Parkdale and Scott with 450 parking spaces. These developments, having a combined total of 1,010 additional vehicles using Parkdale Avenue, have not been accounted for in the TIA. Since the LRT opening at Tunney's Pasture, there are now significantly more buses travelling on Parkdale Avenue (both the two regular bus routes – 14 and 56 as well as the out of service buses making their way to and from the station. Both these factors which are not yet accounted for are critical to understanding the traffic implications of this development.

With respect to the proposed closure of Armstrong Street to facilitate additional ‘public realm’ space adjacent to the development, this possible closure and its implications are also absent from the analysis and need to be addressed in the TIA.

The submitter requests that city staff ask the Applicant to justify creating 322 parking spaces in what is identified as a transit supportive development; to require fresh traffic counts at Spencer/Holland, Spencer/Hamilton, Spencer/Parkdale, Armstrong/Parkdale, Wellington/Parkdale, and Gladstone/Parkdale reflecting post-2024 network conditions following Scott Street’s re-configuration; and to include the impact of the new developments north of Scott Street, the LRT busing requirements on Parkdale Avenue and the possible closure of Armstrong Street, all before this application advances to the Planning Committee.

The New Ottawa Hospital Campus Is Entirely Absent from the Background Traffic Model

Section 3.2.2 of the TIA addresses “Background Growth and Other Area Developments,” and Figure 2-14 identifies other area developments considered in the model (December 2024). The new Ottawa Hospital Civic campus — currently under construction on Carling Avenue, scheduled to open in 2028, and described by the hospital as among the largest hospital facilities in Canada — does not appear in this analysis.

The TIA assumes a 2028 occupancy date for the 340 Parkdale development (Section 2.1.1). The new hospital will open at approximately the same time. The hospital will function as the Eastern Ontario Trauma Centre, serving Eastern Ontario, Western Quebec, and Nunavut, generating significant new traffic volumes on Parkdale Avenue — the primary north-south arterial connecting the Kichi Zibi Mikan and the Queensway to the hospital. Road works and intersection reconfigurations associated with the new hospital are already affecting Parkdale Avenue. The TIA’s Section 3.2.1 uses a Parkdale/Scott historical background growth rate from 2008–2023 (Table 11) and applies it mechanically forward — a method that captures none of the step-change in hospital-generated traffic that will arrive on Parkdale Avenue from 2028 onward.

The submitter notes that Parsons, the firm that prepared this TIA, was identified at the February 24 community information session as also engaged on the traffic assessment for the new hospital campus. The firm’s team is therefore directly aware of the traffic demands the new hospital will generate on Parkdale Avenue. The complete absence of the new hospital from the background traffic model in those circumstances is a gap that requires a specific and written explanation.

The submitter requests that city staff confirm in writing whether the new Ottawa Hospital Civic campus was considered in the TIA’s background traffic projections, and if not, that a cumulative assessment be required before this application advances.

No Emergency Vehicle Corridor Analysis

Parkdale Avenue is correctly identified in the TIA (Section 2.1.2) as a north-south arterial roadway extending from Kichi Zibi Mikan to Carling Avenue. The Ottawa Hospital on Carling Avenue is identified in the local context (Figure 2-1). Despite this, there is not a single sentence in the TIA addressing emergency vehicle access, ambulance response times, or consultation with the Ottawa Paramedic Service or the Ottawa Hospital regarding the emergency corridor implications of this development.

Section 1.0 of the TIA records that the Safety Trigger was met, on the basis that the development is located near the influence of a traffic signal. The safety analysis that follows (Tables 1, 2 and 3) addresses collision history at intersections — a legitimate and useful

analysis. But the Safety Trigger was met, in part, because of the development's location on a primary emergency vehicle corridor. The TIA's response to having met the Safety Trigger contains no analysis of emergency response corridor function whatsoever.

The submitter has reviewed the TIA in full and can find no reference to consultation with the Ottawa Paramedic Service or the Ottawa Hospital. The submitter requests that city staff confirm in writing whether such consultation took place. If it did not, the TIA must be supplemented with an emergency corridor analysis before this application advances.

The Mode Share Assumption Is Not Stress-Tested Against a Sensitivity Scenario

Table 10 of the TIA adopts a Transit Oriented Development mode share that assumes only 7% of peak hour residential trips will be made by private vehicle — on the basis that the site is within 600 metres walking distance of Tunney's Pasture Station. This is the single most consequential assumption in the entire document. It is the primary mechanism by which the TIA concludes that net new vehicle trips generated by 465 units are modest and do not materially affect intersection operations.

Table 9 of the same TIA presents an alternative TRANS mode share that produces materially more vehicle trips. The TIA adopts Table 10 and does not provide a sensitivity analysis using Table 9 as a check scenario. Currently, the 600-metre walk to Tunney's Pasture Station is to a terminal station — the LRT runs only eastward from Tunney's Pasture toward Bayview, Pimisi, Lyon, Parliament, and Blair. Residents travelling west toward Kanata, Stittsville, and the western suburbs cannot use the LRT from Tunney's Pasture at all and must use bus connections or private vehicles. The appropriateness of applying the full TOD mode share to a site at the western terminus of the Confederation Line, rather than an intermediate station with bidirectional service, is a question the TIA does not address. City staff should require a sensitivity analysis using the TRANS mode share before accepting the TIA's intersection capacity conclusions.

The West extension of the Confederation Line to Moodie is expected to open in 2027 which would be before the stated launch date of this development. Based on the performance and reliability of Ottawa's LRT system to date, there may be significant delays. This reality supports undertaking the sensitivity analysis noted above and then also applying these numbers to the updated intersection traffic volumes.

The Road Limit Easement Is Unaddressed in the Traffic Analysis

The submitter understands that the application is subject to a requirement that the Applicant grant a two-metre road limit easement along one or more street frontages. Road widening dedications of this kind reflect the city's recognition that the existing road allowance is below the standard required for the anticipated future function of the road. The TIA does not address what road widening is contemplated, on which frontage, what the resulting road allowance will be, or how the proposed road geometry interacts with the garage access location and sight triangle analysis in Section 4.4.

The Official Plan, Schedule C2 _ Transit Network Ultimate does identify Parkdale Avenue as a 'Transit Priority Corridor' which has the following Note: The intensity of transit priority (e.g. continuous bus lanes or isolated transit priority measures) shall be designated in the Transportation Master Plan. This designation was not identified or analyzed as to its possible implications to the traffic network analyzed in the TIA.

C — What we are asking the City to consider

- That City staff request that the Applicant justify creating 322 parking spaces in what is identified as a transit supportive development.
- That City staff require fresh traffic counts at Spencer/Holland, Spencer/Hamilton, Spencer/Parkdale, Armstrong/Parkdale, Wellington/Parkdale, and Gladstone/Parkdale, reflecting post-2024 network conditions following Scott Street's re-configuration; and to include the traffic impact of the new developments north of Scott Street, the LRT busing requirements on Parkdale Avenue and the possible closure of Armstrong Street, all before this application advances to the Planning Committee.
- That City staff confirm in writing whether the new Ottawa Hospital Civic campus was considered in the TIA's background traffic projections, and if not, that a cumulative assessment be required before this application advances.
- That City staff confirm in writing whether consultation with the Ottawa Paramedic Service took place. If it did not, the TIA must be supplemented with an emergency corridor analysis before this application advances.
- That City staff should require a sensitivity analysis using the TRANS mode share before accepting the TIA's intersection capacity conclusions.
- That City staff require that the TIA address what road widening is contemplated, on which frontage, what the resulting road allowance will be, or how the proposed road geometry interacts with the garage access location and sight triangle analysis in Section 4.4.

Concern 3 — Access onto Spencer Street from the Parking Garage

3a. Garage access directly onto Spencer Street creates a safety and congestion risk

A — What is the concern?

The development's four-level underground parking garage, containing 322 spaces, has its access and exit onto Spencer Street — the narrow residential street immediately across from the 320 Parkdale Avenue and 45 Spencer Street access points. Each of these buildings has a parking garage access point on Spencer St. 45 Spencer St. has 15 parking spaces at ground level and 320 Parkdale Ave. has 36 spaces on 2 levels. Spencer Street is a local street, not designed to serve as the primary access point for a 322-space garage serving 465 residential units.

B — Why is it a concern?

In reviewing the Traffic Impact Assessment (TIA), the Spencer Street garage access analysis is superficial and materially incomplete.

Section 4.1.2 and Figure 4-2 address the proposed garage access on to Spencer St. The TIA characterises Spencer St. as "a wide low volume local street" and uses this characterization as the basis for concluding that the single garage ramp serving 322 parking spaces is operationally adequate. This conclusion has three specific deficiencies.

First, the TIA does not model winter conditions on Spencer St.. Spencer St. has on street parking on both sides. This parking supports the commercial uses currently on the Applicant's site as well as commercial vehicles servicing the area (e.g. building maintenance, delivery).

Presumably, this on-site parking will also be important to the future commercial tenants of the new development. The Applicant has indicated that they hope to have the existing tenants return to the new building. During winter months when Ottawa typically experiences significant snow accumulation, the cumulative effect of the snow build-up and the parked vehicles reduce Spencer Street's effective operating width to a single lane. The TIA's characterization of Spencer St. as "wide" reflects at best summer or off-peak conditions. No analysis is provided to support the conclusion that the garage access and egress will operate adequately when Spencer Street is effectively a single lane street. This situation already creates challenging traffic concerns for the existing residents of 320 Parkdale and 45 Spencer.

At peak periods — morning and evening commutes, weekends, and winter months when effective lane width is reduced — vehicles queuing to enter or leave the garage will back up onto Spencer Street. This will block pedestrian crossings, conflict with through traffic, and reduce Spencer Street's function as an emergency access route.

Second, the TIA's Figure 2-3 identifies that Spencer Street already has two garage access points — serving 320 Parkdale Avenue and 45 Spencer Street respectively. The proposed development adds a third garage access point, for a facility of 322 spaces, between the existing two. The TIA does not model the cumulative queuing interaction between all three access points operating simultaneously during peak periods. Peak-period queuing from the proposed garage that extends back into the Spencer/Parkdale unsignalized intersection — which the TIA confirms operates with stop control on Spencer Street — is a credible operational risk that has not been assessed.

Residents of 320 Parkdale and 45 Spencer observe that the intersection of Parkdale and Spencer is frequently blocked by cars and OC Transpo buses not stopping at the corner but occupying the intersection.

Third, Section 2.1.1 of the TIA states: "Move in operations are understood to occur using Spencer St which is a wide low volume local street." Move-in operations for a 465-unit building will span many months, generating repeated periods of lane obstruction on Spencer Street. No analysis is provided of the frequency, duration, traffic management requirements, or cumulative impact of this activity on Spencer Street operations.

The submitter also notes that Section 2.1.1 states: "It is understood that garbage pick-up will occur at grade level, with garbage bins rolled out on pick-up days and placed on Spencer St." Placing waste containers for a 465-unit building on Spencer Street on collection days will partially or fully obstruct one travel lane on an already-constrained local street in winter. No analysis of the operational or safety implications of this practice is provided anywhere in the TIA.

C — *What we are asking the City to consider*

- **That the City ask that a specific analysis of Spencer Street's capacity to handle peak-period garage access, cumulative queuing interaction and the impact of winter single-lane conditions be undertaken prior to this application moving forward.**
- **That the City ask the Applicant for a review as to whether the garage access and/or waste disposal and move-in operations should be relocated to Hamilton Avenue or Armstrong Street — wider streets that do not run immediately beside an existing residential building with two existing access points.**
- **If Spencer Street access is retained, that the City require specific traffic management measures — such as queuing restrictions, move-in operations and construction-period protocols — as conditions of any approval.**

3b. Construction-period access on Spencer Street has not been addressed

A — What is the concern?

Construction Period Traffic Is Entirely Absent

The TIA contains no analysis of construction period traffic management. Section 2.1.1 notes the development will be constructed in a single phase, assumed earliest by 2028. A four-level underground parking structure across a full city block requires years of deep excavation, concrete pours, and continuous heavy vehicle movements. Spencer Street is the identified site access point for the operational development — it will also be the primary construction access point given the site's configuration.

B — Why is it a concern?

Ottawa's TIA Guidelines (2017) require construction traffic to be addressed where it is material. For a full-block underground excavation immediately adjacent to a residential building (320 Parkdale Avenue and 45 Spencer Street) on a local street already carrying garage traffic from two existing buildings, with a surface to be shared with garbage and move-in operations, construction period traffic is unambiguously material. The TIA is silent on construction vehicle routes, haul road designations, vibration monitoring for adjacent structures, temporary traffic management on Spencer Street, and the duration and phasing of heavy vehicle movements. This is a complete omission, not a partial one.

C. What we are asking the City to consider

- **That the City require a construction management plan specifically addressing Spencer Street before this application advances, including construction vehicle routes and schedules; vibration monitoring during excavation to protect adjacent buildings; and the road restoration standard for Spencer Street on completion.**
- **That the City require that heavy construction vehicles use Hamilton Avenue or Parkdale Avenue to the greatest extent possible, with Spencer Street access kept to the minimum necessary.**
- **That City staff request the Applicant to have Parsons address all seven deficiencies in a supplemental report before the application advances to the Planning and Housing Committee**

The TIA prepared by Parsons for this application is professionally structured but has seven specific and documented deficiencies: stale count data at the most critical intersections predating Scott Street's 2024 reconfiguration; complete absence of the new Ottawa Hospital campus from the background traffic model; no emergency corridor analysis despite meeting the Safety Trigger; an incomplete Spencer Street access analysis that ignores winter conditions, cumulative garage queuing, move-in operations, and on-street garbage placement; an unverified mode share assumption that is not stress-tested against an alternative scenario; no construction period traffic management plan; and an unaddressed road easement requirement. Each deficiency is documented by reference to specific

sections and tables of the TIA itself. The submitter requests that city staff require Parsons to address all seven deficiencies in a supplemental report before this application advances to the Planning and Housing Committee.

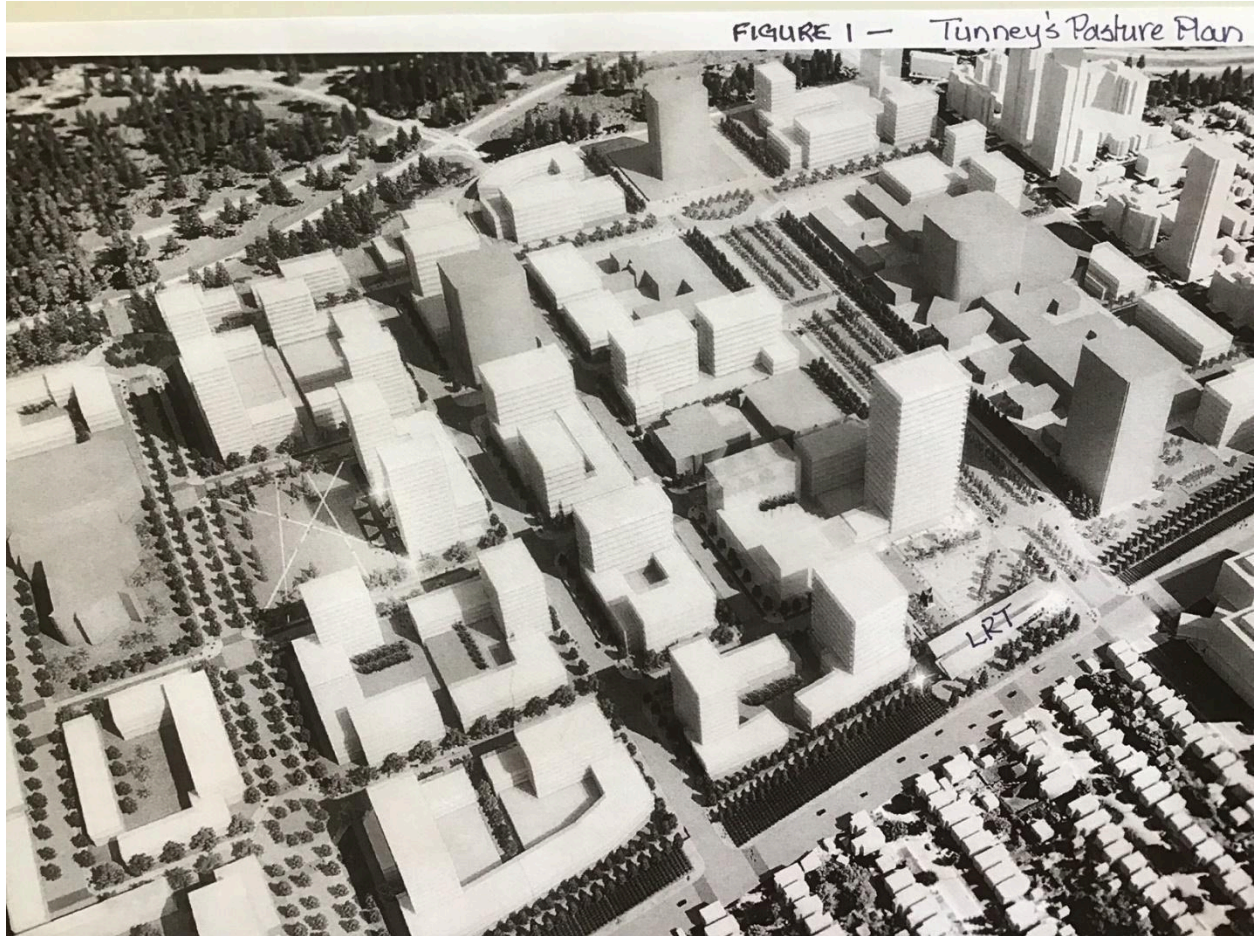


Figure 2
Example of Set-backs

340 Parkdale Ave – Contextual Mid-Rise Alternative

Stepped Podium + 18-Storey Tower – Improved Transition, Reduced Impact

PROPOSED BUILT FORM (Street View from Parkdale Ave)

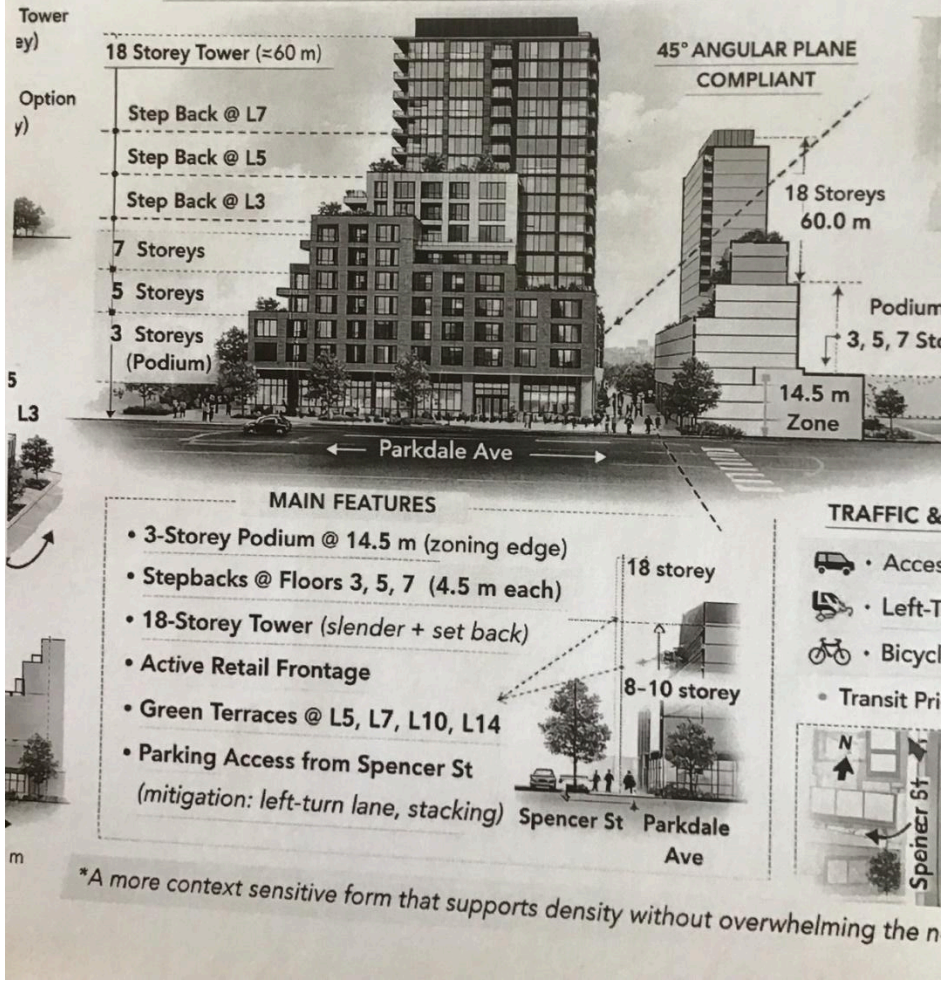


Figure 4



18-storey



38-storeys

Representative massing comparison illustrating the proportional difference between an 18-storey and 38-storey tower on a consistent podium base. This schematic is intended to demonstrate relative scale and visual impact only and is not an architectural rendering of the specific proposal.