

Date: March 12, 2026

From: Jorgen Hoeven, 175 Carruthers – jjcvhoeven@gmail.com

Attn: Jack Smith, City of Ottawa (File Lead) - jack.smith@ottawa.ca

Jeff Leiper, City of Ottawa (Ward Councillor) - jeff.leiper@ottawa.ca

**Re: Submission of Comments for development proposal at 340 Parkdale Avenue**

Dear Mr. Smith, Mr. Leiper,

I am a resident of Hintonburg, living at 175 Carruthers Avenue, and very much enjoy the neighbourhood's amenities, especially nearby public and commercial spaces that are affected by the proposed development.

Please find below my comments on the development proposal for 340 Parkdale Avenue. While I realize there are copious planning and other related documents and materials that are relevant, my comments are based on a review of at least the relevant sections of the following documents and materials:

- Provincial Planning Statement, 2024 (PPS)
- City of Ottawa Official Plan, 2022 (OP)
- Wellington Street West Secondary Plan (WWSP), along with its Community Design Plan (WWCDP)
- Scott Street Secondary Plan (SSP), along with its Community Design Plan (SCDP)
- OLT Decision on files PL110686 & PL130794, Dec 14, 2014 (OLT)
- geoOttawa website
- Proponent's Planning Rationale, dated January 23, 2026
- Proponent's Design Brief, dated February 4, 2026
- Proponent's Consultant's Transportation Impact Assessment (TIA) report, dated January 2026

Aside from online materials, I also attended the open house on February 24, 2026, but unfortunately did not become aware of the Urban Design Review Panel (UDRP) meeting held this past Friday March 6, 2026 until it was too late to attend the zoom meeting – as such, my comments will not reflect any of that content (I was informed that no recording is available, and that the summary report will be pending several weeks).

I would also note that any detailed data that I reference was extracted by hand from the geoOttawa database or estimated from Google Maps. I am certain that city staff have more easily accessible and accurate information than what I could access, but I expect that my conclusions would likely apply even more solidly, given access to more reliable data.

**Executive Summary** (nb. Referenced short forms (Hub, Node, Site, AOR, etc) are detailed out in the text body)

- The minimum intensification standard set by the City is likely already fully met by the Hub, Node and Site, especially given the future redevelopment of Tunney's Pasture, *which allows for future development approvals to be made judiciously, in a selective and appropriate manner.*

- The City’s planned intensification at the Tunney’s Pasture Transit Station Area Hub within the Inner Urban Transect is appropriately located and is *expected to transition from higher intensification on and north of Scott Street down through the Node to the lower built form of Wellington Street.*
- The Proponent has incorrectly presented their existing AOR developable area. To be clear, *the existing allowable developable GFA is 17,693.80 m<sup>2</sup>, while the proposal seeks an additional GFA of 10,406.24 m<sup>2</sup>, or 59% over the currently allowed GFA.*
- The requested increased density and maximum building height is *not appropriate for the site and does not respect the existing human-scale urban fabric.* Instead, the proposed 38-storey tower would be the *second tallest building currently standing in Ottawa*, and the resulting site density would be *1,313.15 DUs per net hectare*, compared to the required 60-80 DUs per net hectare for Minor Corridors in the Inner Urban Transect.
- There are no binding concessions offered by the Proponent to ensure the site supports and complements the Parkdale Park and Market, which is planned to “emerge as the civic and commercial heart of the broader Wellington West community.”
- There is no binding commitment, in spite of verbal presentations made recently, to provide affordable, small-scale commercial spaces to support the retention of small independent businesses, as called for in the WWCDP, or to provide affordable housing, or to substantively address the known “missing middle” housing market gap.
- The base data used for the TIA is outdated, not reflective of seasonality, and missing significant currently known intensification, and omits consideration for expected further intensification along Scott Street and the federal Tunney’s Pasture complex.
- Existing traffic failure at Parkdale Avenue and Spencer Street is not acknowledged, which will greatly impede the ability to make eastbound left-hand turns onto Parkdale Avenue from the site.
- The proposal fails to comply with the Private Approaches By-Law, which requires the entrance/exit ramp to the underground parking to be located at least 60m from the Parkdale Avenue street line, instead of the planned 30m, and there is no mitigation plan offered.
  - The By-law’s purpose is to ensure hazardous conditions are not created by private approaches and that traffic on arterial roads (like Parkdale Avenue) is not negatively impacted by creating, altering or removing private approaches.
  - *Ignoring these requirements through granting an exception is an unacceptable safety risk, which can only be mitigated by scaling down the volume of traffic emanating from the proposed development.*
- Finally, the use of precedent is a known and accepted reality in planning approvals processes, for like circumstances. This site has benefited from a prior exception that was granted at the adjacent 7 Hinton Avenue site, in spite of dissimilar contexts.
  - As such, granting an exception by accepting the proposal as presented would create an opportunity for other developers to claim precedent in turn for their interests, which could significantly compromise the urban fabric of this mixed use area.
- Several specific suggestions are respectfully offered further below for planning staff to consider in developing their recommendation to City Council to address the above summarized concerns.

## Intensification Context

From review of the above listed materials, I fully understand and agree with the City's OP direction for intensification of the Tunney's Pasture Transit Station Area (TPTSA) as a "Hub". The Hub's "Node" (the area bounded by Scott Street, Parkdale Avenue, Wellington Street and Holland Avenue) is also reflected in both the SSP and WWSP with a "Hub" designation, and represents roughly 18% of the TPTSA Hub, being roughly 12 hectares of the roughly 65-hectare Hub (gross hectares). The Node represents about 8 net hectares.

In particular, the urban fabric of the Node is distinct from the areas to the east and west of it, which are much more homogeneous low-rise residential areas, while the Node contains a unique blend of mixed uses (with much of it appropriately carrying the Mixed Use or Light Industrial zoning). Furthermore, as identified in the SCDP and WWCDP, some properties within the Node area appear to be underutilized in terms of efficient space use, with several opportunities for intensification, most particularly (and perhaps most appropriately) along Scott Street. Certainly, the Node is more appropriate and efficient for intensification than the neighbouring residential areas.

## Intensification Intent – Tunney's Pasture Transit Station Area (TPTSA) Hub

As mentioned in the Proponent's Planning Rationale, the PPS sets out an expectation that intensification in Major Transit Station Areas should result in a density of at least 160 residents & jobs combined per gross hectare (for light rail connectivity), while the City's OP sets a higher minimum intensification target for the TPTSA Hub as 250 residents & jobs combined per gross hectare and 250 Dwelling Units (DUs) per net hectare.

Note that, as shown in the SCDP, the minimum intensification target for the TPTSA Hub will be achieved through the current existing and approved development, especially when considering the Tunney's Pasture Master Plan, where the employment levels are envisioned to exceed 20,000 employees and will also include residential and mixed-use development – this more than satisfies the minimum intensification targets set by the Province (10,400 residents & jobs) and City (16,250 residents & jobs) for the TPTSA Hub. As per the SCDP (2014), "The fact that the MUC's density is close to achieving the minimum target already allows intensification to be focused strategically..."; clarifying that *future development approvals can be granted in a selective and appropriate manner*.

In other words, even though there is direction to exceed the minimum required density, ***the pressure for intensification is not immediate and not everywhere***, especially given the scale of what will be achieved in the future via the Tunney's Pasture Master Plan.

## Intensification Intent – TPTSA Node

Within the Node itself, the number of existing and approved developments will result in a rough estimate of about 1,600 – 1,700 DUs, in consideration of the two 25-storey towers recently approved at Scott Street, the reserved development rights of 7 Hinton Avenue/ 281 Armstrong Street, and the *existing* development rights of 3 Hamilton Avenue/ 233 Armstrong Street. Combined with an estimated job count (mostly counted at Holland Cross, but also from the various light industrial and commercial operations in the Node), it is clear that the Node itself (at roughly 300 residents and jobs per gross hectare) also already well exceeds both the PPS and OP expectations given existing approvals.

The Node itself does not appear to exceed the OP's expectations of 250 DUs per net hectare, but using the OP's DU density target of the overall TPTSA Hub for the Node is an unreasonable expectation, given that its Mixed Use nature will naturally have a substantive commercial component, which the planning framework intends to preserve.

### **Intensification Intent – “340 Parkdale” Site (223, 229, 233 Armstrong & 3 Hamilton)**

As pointed out by the Proponent, the Site itself is designated fully as a Minor Corridor within the Inner Urban Transect, such that those more specific OP policies apply. For density targets, this indicates (Table 2b) that 60-80 Dwelling Units per net hectare is the expected minimum density for the Site.

This transitional approach confirms that while the overall intensification target for the TPTSA Hub per the OP is 250 residents & jobs combined per gross hectare and 250 Dwelling Units (DUs) per net hectare, this level of intensification is not expected to apply uniformly, and a lower minimum target is explicitly expected for the areas that are fully within the Minor Corridor designation, which applies to the site in question. This indicates that a lesser DU density (than the average expected for the rest of the Hub) is reasonable and expected for the site at hand.

Rather, it is expected, as argued above, that the focus of additional intensification will fall primarily on Scott Street (as part of the intensification of a Mainstreet Corridor) and north of Scott Street (via the Tunney's Pasture Master Plan). This also conforms with the many references in all layers of the planning framework that intensification should consider the impact on adjacent properties and in particular, that the Node area should transition from a higher intensification at Scott Street down to the 6-storey built form on Wellington Street – this is the reason that *a general 8-storey maximum building height is envisioned for the Node area beyond those properties fronting on Scott Street.*

### **Development Proposal Concerns**

[Note that most of the reasoning provided below is well known to planning officials, but I have kept the detail in my submission to clarify my interpretation (in case it is in error) and for other readers who may not have the time to review the planning frameworks.]

#### **1) Misleading presentation of existing ‘as-of-right’ (AOR) Gross Floor Area (GFA) allowance and lack of justification of additional requested GFA**

- a) Incorrect use of Floor Space Index (FSI) for 3 Hamilton Avenue and 233 Armstrong Street (“Tega Site”)
  - i) The WWSP, s2.3.20 indicates that “Building height in the area bounded by Holland and Parkdale Avenues and Armstrong and Spencer Streets shall have a maximum of eight storeys or 27 metres to provide a transition from the taller buildings near Scott Street down to the mainstreet building height of Wellington Street West.”
    - (1) To clarify, because of setback requirements and thus an inability to build right to the property boundaries, lots allowing an 8-storey building are generally understood to have an FSI of 6.0, (if so explicitly constrained).
  - ii) For the Tega Site, the WWSP, s2.3.21: states that “Notwithstanding the above Section 2.3, Policy 20 the property at 233 Armstrong and 3 Hamilton is permitted to develop with a Floor Space Index

[FSI] that is generally equivalent to an eight-storey building without being subject to a maximum height limit of eight storeys (27 metres)”

(1) This exception for the Tega Site was granted after a lengthy approval and appeal process, which culminated in an OMB proceeding, where the FSI was set at 6.0, by way of the OMB’s direction to the City to amend their zoning bylaw, and as is currently captured on the geoOttawa zoning data of “MC16 [2063] **F(6.0)** S333-h” for the two lots, *with further specific building height restrictions of 2, 5, 7, 9 and 18 storeys*, as per Schedule 333.

(a) To be clear, while there is a sense that “...they are already allowed to build up to 18 storeys...” this is specifically constrained to *only about a quarter of the Tega Site’s footprint*, in one corner of the site - the rest of the allowable GFA largely conforms to the pre-existing planning intent of an 8-storey building.

(2) To reconfirm the OMB’s intent by calculation, the proposal approved at the time was for multiple height towers and podiums, with an overall requested GFA of 16,068.35 m<sup>2</sup> (12,968.35 m<sup>2</sup> residential, 1,566.2 m<sup>2</sup> ground floor retail, 1,534.1 m<sup>2</sup> second floor office/condo and live/work lofts), which yielded an FSI of 6.054 (16,068.35 m<sup>2</sup> of GFA)/(2,654.24 m<sup>2</sup> lot area), which actually slightly exceeds the approved zoning of FSI of 6.0.

(a) The effect then, despite City Council’s rejection of the request in the first instance, was that *the OMB only directed that the proponent (Tega Homes) be allowed to redistribute the equivalent of the existing allowed density of an 8-storey building “...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 Street”...”, as it was felt that “...a “slab” building would not be appropriate or as interesting...” as a building of varying height podiums and a tower* (wording quoted from OMB proceedings).

(i) *As such, the OMB granted NO additional GFA, but removed the general maximum building height constraint, and instead set very specific and limited maximum building heights, to allow for redistributing building volume that was already approved within the WWSP, confirming this as an appropriate density.*

iii) The FSI calculation is thus clearly understood as being the Total GFA divided by the lot area, to arrive at the FSI factor. As such, the allowable GFA for all uses shall be the lot area multiplied by the FSI factor.

(1) As per the Planning Rationale report, the lot area having a FSI of 6.0 is 2,654.24 m<sup>2</sup>. When multiplied by the FSI of 6.0, *this yields a GFA of 15,925.44 m<sup>2</sup>, NOT the suggested 21,233.92 m<sup>2</sup>* (which was erroneously arrived at by the Proponent by multiplying the lot area by 8 stories instead of by the FSI of 6.0)!

b) Incorrect assignment of additional FSI to 223 and 229 Armstrong Street

i) While the planning framework does generally allow for 8-storey buildings (maximum height of 27m) in the Node, there are specific exceptions for parcels that are constrained by either building height or FSI. The 3 Hamilton/233 Armstrong lots are granted a higher allowance, with no maximum height but constrained by an FSI of 6.0. Conversely, the 223 and 229 Armstrong lots are constrained with a lower building height of 13.5m and an FSI constrained to 2.0, likely due to being adjacent to a well-regarded and active open greenspace.

ii) As such, the existing allowable GFA for the 223 and 229 Armstrong Street lots is the combined lot area of 884.18 m<sup>2</sup> multiplied by 2.0, *for an allowable GFA of 1,768.36 m<sup>2</sup>.*

- c) **Total Allowable AOR GFA for the whole Site is therefore 17,693.80 m<sup>2</sup>**, and dividing by the Site's total area gives an allowable overall FSI of 5.0 (= 17,693.80 m<sup>2</sup>/3,538.42 m<sup>2</sup>), *if it were accepted to consolidate the Site and apply a singular FSI factor*, which would be a significant benefit to the Proponent, as it grants flexibility to redistribute the developable volume over the entire site.
- d) **However, the requested total GFA is 28,100.24 m<sup>2</sup>** (Residential of 27,274 m<sup>2</sup> + Ground Floor Commercial of 524.24 m<sup>2</sup> and Restaurant of 302 m<sup>2</sup>). *The additional requested GFA over the existing allowable GFA is thus 10,406.24 m<sup>2</sup>, or 59% over the existing allowable GFA.*
- i) *This is an extremely substantial increase, which calls into question whether it conforms with the intent of the planning framework.*
  - ii) If approved, the requested GFA on the Site would represent an FSI of 7.94 (= 28,100.24 m<sup>2</sup>/3,538.42 m<sup>2</sup>), **which is an almost 60% increase in density over the well-established planning intent for these lands.**
    - (1) *Even the OMB at the time provided Tega Homes NO additional density – it just allowed for the redistribution of the approved developable volume.*
- e) Typically, if a proponent requests a substantive change, especially an increase, to a well-developed, long-standing and clearly published planning framework, in order for a municipality to agree to such a request (or for the OMB (now the OLT) to override the municipality's plans in favor of a proponent) *there should be a clear justification of how the additional request will bring a net benefit to the community*, beyond simply improving the proponent's bottom-line.
- i) There is no economic impact study that reviews the expected impact of the proposed additional development to the local area, to the target residential market and/or to existing or prospective commercial tenants.
  - ii) In fact, in their Planning Rationale, there is not even an acknowledgement that the requested total GFA exceeds their (already misrepresented) allowable GFA; it is simply stated that in order for their proposal to proceed, there needs to be an amendment made to "...permit the proposed maximum building height [of 38-storeys] without any maximum floor space index".
    - (1) If not read carefully and fact-checked, the proposal seems to suggest that they simply request to remove the building height constraint, *with no mention made about the 59% increase in additional GFA being asked*, except as a sideline that the amendment be worded to include "...without any maximum FSI."
      - (a) ***This lack of clarity and transparency about the very substantial increase in density that is requested is misleading and disingenuous.***
      - (2) By requesting this amendment for the entire Site, *they are asking that the entire Site be capped at their proposed maximum of 38 storeys, with no GFA constraint! In my opinion, this is simply not a reasonable request*, given the lack of justification of adequate community benefit for the requested ***very substantial increase in density.***

## 2) Requested density is inappropriate for the area's urban fabric

- a) As discussed previously, there are ample references (PPS s2.4.2.3.b, the OP sections 3 and 5, the SSP and SCDP, the WWSP and WWCDP) that the Node area should be a zone of transition in density. Most specifically:

- i) Per the WWCDP s 3.5.3, one of the design objectives for the built form of redevelopment is to “Ensure future redevelopment of blocks between Armstrong and Spencer reflect the human-scale of the surrounding mainstreet, the Parkdale Park, and adjacent residential uses”
  - ii) Further, WWCDP, Policy A7 states that “Redevelopment shall have a maximum 8 storey or 27m building height. This will ...provide a transition in character between the taller built forms from Scott Street to Spencer Street (zoned to range between 10 and 12 storeys) and the traditional Mainstreet built form of Wellington Street (zoned at a 6-storey maximum building height).”
- b) The presence of ***the proposed 38-storey tower is simply in no way a transition of density to any of the existing uses on adjacent lots***, being either open greenspace (south), 2-storey heritage commercial (west), 2-storey residential (east), or 8-storey residential (north).
- i) It is true that the lot to the west (7 Hinton Avenue) has reserved development rights that have not yet been exercised, which were specifically used during the OMB proceedings as a precedent to allow Tega Homes to get a similar exception (see more detail further below about the setting of precedent).
    - (1) Per the detail of the OMB proceedings, the 7 Hinton site might well be built to a similar height as Tega Homes’ request, perhaps even up to 20 storeys, and as such, the proposed varying heights of the Tega Homes proposal would not feel out of character.
      - (a) In other words, the OMB directed that the redistribution of the existing allowable volume be accepted at a height that would not be out of line with what was already approved for the adjacent properties.
      - (b) Neither the WWSP nor the adjacent zoning has changed since then, suggesting that there is also no basis to make a change to accommodate the request of ***20 storeys more than what was decided at the time was a suitable height – that is more than twice the height of what the OMB felt was reasonable!***
    - (2) In any case, an application for the development of 7 Hinton has not been forthcoming, and it will be constrained by the need to integrate the development with the co-located heritage building, so it remains to be seen how that development is ultimately built out, especially since a portion of that volume is allowed to be built out on the adjacent 281 Armstrong Street lot.
      - (a) As such, there is no good justification for the current proposal to vastly exceed what was approved at the time as a reasonable match to the future adjacent development of an “up to a maybe 20-storey building.” ***A 38-storey tower is simply not going to be similar at all in built form to what might eventually be built out at 7 Hinton Avenue, and it certainly is not in harmony with other low- and mid-rise uses of the adjacent properties, or the nearby mid-rise built form of Wellington Street.***
- c) Further, as pointed out by the Proponent, the Minor Corridor designation of the Inner Urban Transect fully applies to the Site, such that the expected minimum density is lower, at 60-80 DUs/net hectare.
- i) The proposal, if approved, would result in a density of **1,314.15 DUs per net hectare** (= 465 DUs/3,538.42 m<sup>2</sup> Site area). ***This is FAR beyond expectation for a Site within the Minor Corridor designation!***
  - ii) Even if the Minor Corridor designation did not apply, the proposed density still far exceeds even the average minimum density for the Hub as a whole (of 250 DUs per net hectare), which as mentioned previously is expected to be largely achieved through the areas on and north of Scott Street.

- d) Finally, the proposed height of the 38-storey building is simply **not at all reflective of the local neighbourhood**. In fact, should this development be built as proposed, *it would currently rank as the second tallest building in Ottawa!*
- i) The only taller tower in all of Ottawa is the Claridge Icon, at 45 floors, but in contrast, that development is located directly on Carling Avenue, which is designated as a Mainstreet Corridor within the Inner Urban Transect, and within 200m of the Dow's Lake O-Train Station.
  - ii) Most other towers over 30 floors in height within the Inner Urban Transect (Minto Metropole (33 storeys), fronting Scott Street and near Westboro O-Train; Luxo Place (35 storeys), fronting Ogilvie and near Cyrville O-train) are fronting Mainstreet Corridors, and nearby to an existing or planned O-train station.
    - (1) The exceptions to this are the Dale I (33 storeys) and the Parkdale Collective (31 storeys), both fronting Parkdale Avenue (as a Minor Corridor), nearby to Tunney's Pasture O-train – however, these front the Federal Tunney's Pasture Complex, and therefore the urban fabric of the eventual build-out per the Tunney's Pasture Master Plan is a more appropriate context than the urban fabric of the Wellington Street built form, from which they are completely disconnected by the O-train transit corridor and Scott Street itself, which create a significant visual gap and built form boundary.

The current request of a 38-storey tower well surpasses the height of the currently existing and approved developments on Scott Street, where the recently approved building heights are 25 storeys, and thus the proposal in no way represents a gentle transition from the more distant Scott Street to the more proximate mainstreet built form, but rather *it will literally tower above all other developments in the area between Scott Street and Wellington*. While no 3D renderings have been provided from distant vantage points, it is certain that the proposed tower will be seen from Wellington Street, towering behind the main street built form.

### 3) Affordability and respect for continuity of local neighbourhood businesses

- a) Without any detailed information being presented about the pricing of the proposed residential or commercial spaces, it is hard to concretely object to the expected unaffordability of the proposed spaces. There is no economic data given, nor any reference to discussions with existing commercial tenants, nor a market study presented for the intended residential units.
- b) However, the WWSP does set out a Specific Policy Area for the Parkdale Park and Parkdale Market Hub that directs that this area will “emerge as the civic and commercial heart of the broader Wellington West community.” Further, WWCDP s3.5.2 identifies the character of the neighbourhood, the importance of Parkdale Park and how the immediate location, being adjacent to the Parkdale Park and public market, *needs to support and complement those valuable neighbourhood assets, by:*
  - i) “Keeping a link to the community’s industrial heritage, as redevelopment occurs to underutilized lots in the traditional industrial area.”
  - ii) “Artisans and related arts uses should be attracted and retained to inspire people of the community.”
  - iii) “The low-scale, mixed residential and commercial character, along Hinton between Wellington and Armstrong, creates a unique pocket of built form and use and this should be respected as the area evolves”.
- c) Beyond the suggested (but not legally binding) introduction of the Private Owned Public Space (POPS), and the purported retention of the Carleton Tavern, how is the development proposing to enhance the

neighbourhood? How will some of the Proponent's suggested improvements be bound to the development?

- i) The precedent exists for the City to demand concessions from developers to ensure community needs are prioritized, especially as trade-offs for granting of planning framework exceptions. This is seen in WWCDP, Policy A1e specifically for the Parkdale Park and Market Area, where concessions are sought from developers: "Additional building height increases may be considered to a maximum of 9 storeys for providing one or more of the following: a) public open space; for example, a plaza and greater sidewalk width; b) affordable rental and ownership housing; cash contribution for affordable rental housing at other sites; c) community child daycare; d) public art and/or extraordinary and innovative architectural feature(s)."
    - (1) What binding assurances will be given that the proposed low-rise restaurant space will indeed be an affordable neighbourhood gathering place such as the current stand-alone Carleton Tavern, in order to maintain and foster community connectivity, as opposed to becoming an up-scale chain restaurant?
    - (2) What binding assurances will be given for the inclusion of an artisan or arts centre? Given the scale of the development, would a larger arts-focused space be included, in order to attract a significant anchor tenant, similar to the GCTC? Would community services be intentionally sought as potential tenants, such as a youth center, or a relocation option for the nearby senior's community center or food bank such as Mino 'Weesini, one of the current tenants?
  - ii) I respectfully suggest that if any additional developable GFA is granted, *which I do NOT support*, then at minimum this *must only be given in trade for requiring explicit "community-first" concessions* as suggested above, in order to respect the planning intent of the WWCDP.
- d) The WWCDP also explicitly stresses the need to consider commercial space affordability, to support smaller independent retail businesses (such as exist today), rather than large-sale commercial operations. Per WWCDP, Policy A11a: "The ground-floor space of new infill development, such as retail or restaurant space, should be designed to be adaptable, for example, providing between 170m<sup>2</sup> to 200 m<sup>2</sup> maximum of GFA per unit size. This will ensure smaller size storefronts that are more reflective of the mainstreet building format; one with proven long-term adaptability and active frontages. A 200m<sup>2</sup> maximum of GFA per unit or outlet on the ground floor applies to retail, service-oriented commercial uses, and office uses. Additional office use would be acceptable on any floors above the ground floor. Large format retail spaces are not desirable in this area as they typically create a monotonous design"
- i) While this constraint was removed for the Tega Site during the OMB proceedings, the intent of the WWCDP is to ensure neighbourhood scale businesses remain and are fostered, not just on Wellington Street, *but also as specifically stated for the Parkdale Park and Market Area*, rather than large format retail operations which are stated to be undesirable. This intent should still be respected where possible.
    - (1) Note that during the OMB proceedings, *it was erroneously suggested* that the site in question was closer aligned with the TPTSA and considerably far from the Wellington Mainstreet ("...close proximity to Tunney's Pasture Transit Station and employment node. It was also a considerable distance to the boundary of the "Traditional Mainstreet" designation along Wellington Street West.")
      - (a) In fact, the point-to-point distance from the parcel center to Mainstreet is 185m, while to the Tunney's Pasture Transit Station (TPTS) is 415m. In terms of a practical walking

distance, the distance from the Carleton Tavern to Parkdale/Wellington intersection is only 150m, while the walk from DripHouse to TPTS is 500m.

- (b) From an aesthetic perspective, due to the visual blocking of the mid-rise building at 320 Parkdale/ 45 Spencer Street, the site is more naturally associated with the adjacent Parkdale Park and Market, which transition down to the built form on Wellington Street, as opposed to the area to the north of the site which contains little public space or retail operations to attract pedestrians, short of as an area to pass through to get to the TPTSA.
- ii) Without this constraint, it is unclear how the existing commercial tenants, which define much of what the community enjoys of the current space, will have an affordable opportunity to relocate into the new commercial space once built.
  - (1) The Proponent suggested at the Public Meeting that they wished to retain their existing tenants once the development is built. If this is true, what binding measures are they willing to put in place to ensure such preference? First-right of refusal to any new leases? Rent controls? *Without any binding terms, these are simply words stated to appease the public, that will be forgotten or ignored over time.*
  - (2) For this reason, I suggest consideration should be given for the size constraints as provided for in the WWCDP Policy A11a be reimposed on the Tega Site, or *at minimum retained on the equivalent GFA currently existing on 223 and 229 Armstrong Street*, to ensure that the resulting commercial space at least in part directly serves the neighbourhood as it does now.

#### 4) Traffic Impact

- a) The base traffic data used to develop the Traffic Impact (TIA) Study *seems to be understated*, for the following reasons:
  - i) *The Existing Condition traffic count data that is used is outdated* (in some cases as old as 2016), and most data is collected during winter months.
    - (1) This does not account for the currently higher traffic volume than 10 years ago and is not reflective of the busier spring, summer and fall months, when the Parkdale Market is open for business 7 days a week (from May to October).
  - ii) *The traffic forecast data does not include all existing approvals*, specifically seeming to omit the already approved 25-storey tower at 1560 Scott Street (it considers 1546 Scott Street, but that is distinct from the 1560 Scott Street development) and does not consider the future impact of the Tunney's Pasture intensification, which will make that location by far the largest employment hub in the Inner Urban Transect.
    - (1) By not considering adequately the future loading on the road network, the traffic intensity will be understated, in particular as Tunney's Pasture will be a very significant employment destination (including for potential residents at 340 Parkdale), and a source of new outbound residential traffic, that will in part use Parkdale Avenue to access Highway 417, routing past the 340 Parkdale site.
  - iii) *The traffic count data are forecast on the assumption of no growth (0%)*. While that might be reasonable if the 340 Parkdale site existed in isolation, the impact of the intensification along Scott Street and the Tunney's Pasture Master Plan is extremely likely to result in a substantive growth of traffic in the neighbouring area, which will definitely increase loading on Parkdale Avenue (an arterial roadway) and Holland (a major collector roadway).

- iv) *The traffic data are further substantively modified* for the site being in a Transit Oriented Development (TOD) area due to being within 600m of Tunney's Pasture Transit Station, which has the effect of reducing the forecast trip count for vehicles (driver & passenger) from 39% to 20%, in favour of transit, cycling and walking (up by 9%, 7%, 4%, respectively).
- v) The result of the above data analyses suggests that the Auto - Driver peak trip per hour falls below the threshold of needing to complete a Neighbourhood Traffic Management, Transit and Intersection Design (s. 4.6, 4.7, 4.9).
  - (1) Nonetheless, given the expected substantial impact of major future nearby intensification, especially the federal Tunney's Pasture complex, *it is highly suggested that these sections need to be completed.*
- b) Existing conditions on Parkdale Avenue, as witnessed daily, show that the traffic volume at peak hours (both AM and PM) routinely results in bumper-to-bumper traffic from Scott Street all the way past the Parkdale/Armstrong signalized intersection, such that the Spencer/Parkdale intersection is routinely blocked.
  - i) The result is that during peak times, it is very challenging to exit Spencer Street to enter Parkdale Avenue, especially northbound (the eastbound left-turn) towards what will be a yet larger employment hub and more important destination.
  - ii) The short block between Armstrong Street and Spencer Street also likely precludes it from becoming a signalized intersection, so it is unclear how additional traffic from the 340 Parkdale site will be able to be managed to allow access to Parkdale Avenue, the anticipated most common direction of traffic.
    - (1) The significant concern here is safety, as the distance from the proposed parking ramp to Parkdale Avenue will only allow 5-7 vehicles to stack. If this becomes fully loaded at peak hours due to delays in being able to safely make east-bound left-turns onto Parkdale Avenue, the blockage of traffic down the ramp could be disastrous, as the bottleneck would not allow for any emergency movements into the site. In wintertime, with snowbanks pinching the drivable roadway cross-section, the Spencer Street could become impassable.
    - (2) As well, the difficulty in making east-bound left-turns onto Parkdale Avenue from Spencer Street may result in a higher frequency of accidents at this intersection as drivers (and cyclists) make rash entries onto Parkdale.
    - (3) *There needs to be a more detailed and thorough study, with more robust data and conservative forecasting to ensure this safety issue will be suitably mitigated.*
- c) As pointed out in the TIA p31, "Given the small size of the lot..." Spencer Street will be used for streetside truck operations and garbage collection, which will effectively reduce Spencer Street to a single lane during that time.
  - i) In wintertime, snowbanks resulting from the current level of snow clearing operations will make this a significant pinch point, and at times will render the street impassable until the streetside operations are completed – I witness this currently on Carruthers Avenue, where the building I live in uses a similar strategy for loading and waste management, but the building at 175 Carruthers Avenue has a smaller commercial footprint than anticipated at 340 Parkdale (operations which will also need to be supported by routine delivery of supplies, etc).
  - ii) While this might seem reasonable, the private approaches on the north side of Spencer will be severely negatively impacted, and thus *an alternative approach should be considered (including*

*possibly a curb cut-out or an off-street loading space, and/or exploring the possibility of one-way traffic designations – the latter of which would need a broader context traffic study).*

- d) As confirmed in the TIA report, the proposal does not meet the Private Approaches By-Law 2003-447 s.25.1.m.ii, where it requires a site within 46m of an arterial highway having more than 300 parking spaces to ensure a distance of at minimum 60m from the nearest street line.
- i) The reason for this is obvious – if a development is of such a scale to have more than 300 parking spaces, the lot size is expected to be large enough to allow for proper distance from a busy street, so that adequate stacking room is provided to prevent spillback that could block the entrance/exit from the site.
  - ii) The TIA admits that the site is of a small size and yet *offers no alternative to address this shortfall other than stating the proposal complies with all other aspects of the bylaw!*
    - (1) The statement by the Transportation consultant that this requirement does not apply because Spencer Street is a local road is ***simply wrong and misleading***. The condition for sub-section ii of s2.25.m to apply is whether the property is, from a listing of uses, an apartment building, which it is. ***Spencer Street’s classification as a local road has no bearing on the condition!***
    - (2) The suggestion that because of their modeling (which may be understated as per my review above), the exit ramp “...is not anticipated to cause *an undue safety concern...*” and “... the likelihood of vehicle spillback or operational impacts at nearby intersections *is considered negligible*” **is not sufficient**.
      - (a) As per risk management principles, even if the probability of a risk is quite low, when the consequence of that risk is unacceptable, the risk should be mitigated. ***Suitable risk mitigation has not been proposed, which is required or the risk should be avoided.***
  - iii) The only way to alleviate this By-Law requirement is to argue for an exception. However, note that By-Law’s section 25.1.m.ii has staggered requirements – for up to 100, 200, 300 and 300+ parking spots, the required distance from the nearest street line is 18m, 30m, 45m and 60m.
    - (1) It might be reasonable to consider an exception to one step lower in the required distance, but to consider an exception as if there were only 199 parking spots instead of 322 spaces, is understating reality by 123 spaces!
    - (2) However, if the proposal density is scaled back, as I suggest elsewhere, then the number of dwelling units will decrease, and the number of parking spaces will also proportionately decrease.
      - (a) *By rough calculation, if the proposal were built to the equivalent of the overall site’s AOR density, then the proportional need for parking spots would likely be just below 200, which would allow them to be in compliance with this bylaw.*

## 5) Setting of precedent

- a) History shows that exceptions granted to planning policies are often used as precedent for subsequent developments. *In fact, this site has already benefited from that.*
  - i) As described already, the previous developer for this site (Tega Homes) had put forward a proposal for the removal of the maximum height of 8-storeys, to instead use an FSI of 6.0 and no maximum height. The approval process ultimately went for appeal to the OMB, where the Proceedings concluded to approve the request, overturning the City’s decision to reject the proposal.

- (1) A cornerstone of the decision at the OMB for Tega Homes was that an exception was already granted on the adjacent 7 Hinton Street site for approving the redistribution of allowable GFA, constrained against a fixed FSI and with removal of a maximum building height. This was granted as a concession against an imposed heritage designation, and strangely, it became a precedent for the Tega Site, albeit with more specific height constraints.
  - (2) Strangely, because the heritage designation constraint *did not exist on the 3 Hamilton/233 Armstrong site*, and thus the use of the adjacent exception should not necessarily have been appropriate justification for granting a similar exception to the Tega Site.
  - (3) Even though the basis for the original exception did not apply to the Tega Site, it seems that it was the expected end result of the 7 Hinton Street exception (“...a building of maybe up to 20 storeys”) that became the precedent, **regardless of why that exception was granted.**
- ii) It is interesting to note that Tega Homes, in what seems to be a very similar approach to the current proponent, started their application to the City with a 36-storey building request, which resolved down into the 2, 5, 7, 9, and 18-storey multi-tower proposal.
- (1) From the OMB proceedings: “The development concept evolved through the Urban Design Review Panel pre-consultations from a 36-storey tower along Parkdale Avenue to the proposed development concept with four iterations.”
  - (2) *Is this then simply a negotiation tactic?*
- iii) As such, it is clear that either and/or both of the City and the Province agree to use exceptions granted to neighbouring properties as precedents for setting (or removing limits on) maximum building heights for adjacent developments, even if the reason for granting of the initial exception does not apply to the next site.
- (1) What then would prevent the eventual developer at the 7 Hinton site from requesting an exception to be allowed to build a 38-storey building, if that were approved at the 340 Parkdale site? Is this a proverbial “race to the bottom” (or in this case, to the sky)?
  - (2) Therefore, **there is grave caution requested** during the consideration of granting any further increase to the currently in place building height and/or FSI on the property, as it will likely be used in future to try to obtain additional (*in my opinion inappropriate*) exceptions to other properties within this southern portion of the Node area.

### Suggested Recommendations

I respectfully offer my suggestions below for planning staff to consider while developing their recommendations to City Council with regards to this request for an Official Plan Amendment and Zoning By-Law change.

- NO granting of any additional developable GFA beyond what is already granted per the existing zoning bylaw, except for allowing the Proponent to consolidate and redistribute the existing allowable developable GFA by setting a maximum FSI of 5.0 over the consolidated 340 Parkdale site.
  - If all else of the proposal design remained identical, the existing GFA would yield a reduction in tower height, in turn reducing the DUs, in turn allowing for a reduction of needed parking spaces, possibly (per proportional calculations) to just under 200.

- Reintroducing the commercial space constraints as provided for in the WWCDP, Policy A11a for the entire site, or at minimum for an equivalent of the GFA for lots 223 and 229 Armstrong Street, where those restrictions currently apply.
- Requiring an updated TIA, including requiring the previously exempted sections (4.6, 4.7, 4.9) for Neighbourhood Traffic Management, Transit and Intersection Design to be submitted, even if the updated Auto Driver trips per hour at peak does not specifically require it.
- Requiring the inclusion of appropriate mitigation measures for the street-side truck operations and garbage collection, potentially through a curb cut-out or an off-street loading space.
- Requiring a reduction in scale of the proposal so that the needed parking spaces would be less than 200 spaces, which would allow for compliance with the Private Approaches By-Law.

## Conclusion

As mentioned, I live at 175 Carruthers, a 19-storey building, being a recently developed intensification, appropriately fronting on Scott Street (due to Scott Street being designated as a MainStreet Corridor in the Inner Urban Transect). *When I stand on the sidewalk next to my building, and I look up to consider the visual impact of a building like the one I live in but twice as tall, the increased visual impact is huge!*

When I then imagine this being located opposite the Parkdale Park and Market and opposite detached 2-storey homes and 2-storey businesses, I cannot find that such a tall tower would be appropriate or in any way able to be integrated into the local urban fabric, no matter how much it is stepped back with lower-storey podiums. *When I stand at the Drip House café and look across the street at the 8-storey residential building and consider the visual impact of a building almost 5 times its height, it is simply overwhelming.*

The height is simply incongruous – *it would stand out like a sore thumb, towering well, well above everything.*

To be clear, I am supportive of the redevelopment of the 340 Parkdale site, and much of the design work that has already been done is very appealing, thanks to the iterative work done with City staff and public input. I believe the proposed site redevelopment has many merits, but I am **solidly opposed to the proposed degree of intensification and the overall height of the proposed tower.**

I am also concerned about retaining the current engaging and active urban fabric, especially with regards to the existing small independent businesses, who will struggle to survive their forced relocation during the expected 4-year construction period in order to possibly return to their neighbourhood, if they can afford to do so at that point.

***The proposal is simply asking too much, when there is no need for the 340 Parkdale site to bear the brunt of intensification that can much more appropriately be located in the TPTSA Hub on and north of Scott Street*** – especially when the immediate pressure of intensification has already been more than met by the Hub, the Node and the Site. In fact, the Node currently outdoes the overall Hub in terms of intensification, and the Site at its currently approved density in turn well outdoes the Node in terms of intensification – ***by planning intent it should be the other way around!***