

April 28, 2021

Andrew McCreight, Planner III
Development Review Central
Planning, Infrastructure, and Economic Development
City of Ottawa
110 Laurier Avenue West
Ottawa, ON K1P 1J1

Dear Mr. McCreight,

**Re: East Flats – Phase 4 (301 Lett Street) Zoning By-law Amendment Application
Panning Rationale Addendum
Proposed Ground Floor Uses and Mid-block Pathway**

Urban Strategies Inc., on behalf of Claridge Homes, is pleased to submit this letter as an addendum to the Planning Rationale prepared in support of the Zoning By-law Amendment application for Phase 4 of the East Flats development. This letter clarifies the proposed ground floor condition and provides a rationale for a variance from the standard requirement in Mixed-Use Downtown Zones for a minimum of 50% of the ground floor area to be occupied by active, non-residential uses. We propose adding a provision to the zoning amendment that reduces this requirement to 27% and allows it to be partially met by a day care facility, among other active non-residential uses currently listed in By-law 2008-205.

Background

In April 2020, Claridge Homes filed a Zoning By-law Amendment (ZBA) application to transfer the hold on the block bound by Lloyd Street, Fleet Street and Lett Street, where Phase 4 is proposed, to the northwest block along Booth Street, where Phase 4 had been proposed. Phase 4 consists of two towers, a 25-storey condominium apartment building and a 30-storey rental apartment building, atop mixed-use podiums with commercial and daycare spaces. A landscaped mid-block pedestrian walkway is also proposed between the two buildings, lined with residential amenities within building podiums and the daycare playground.

In June 2020, Claridge Homes filed a Site Plan Control application (SPA) for the proposed next phase. City Staff and commenting agencies have provided official comments on the ZBA and SPA applications, and the application was also reviewed by the NCC's Advisory Committee on Planning, Design and Realty and the City of Ottawa Urban Design Review Panel (UDRP). A number of comments relate to the ground floor condition, namely the amount of proposed commercial and active frontages at grade, as well as the design of the mid-block pedestrian walkway. Local residents have also questioned why there is not more ground-floor commercial space in the development. The current ZBA and SPA resubmission includes an increased amount of total active ground floor uses from approximately 740m² to 868m², a result of increasing the size of the daycare from 383m² to 482m² and the addition of a new 83m² commercial unit on Fleet Street.

Proposed Ground Floor Uses

As illustrated in Figure 1, the ground floor of the proposed development includes approximately 482m² of daycare space and an approximately 83m² commercial space in the podium of the 25-storey condominium building, and approximately 303m² of commercial space in the 30-storey rental building. The daycare has been sized to accommodate 50 children. The proposed commercial space in the 30-storey building is two storeys, with an additional 378m² of space on the second level, bringing the total proposed commercial space to approximately 764m². The two-storey commercial space is located at the corner of Lett Street and Lloyd Street, facing the future City Park and the Pimisi LRT station.

The entrances to the apartment buildings and lobbies anchor the northwest and southeast corners of the block. Additionally, a variety of residential amenities are also located at grade, including a swimming pool and a fitness centre in both buildings, as well as offices/board rooms. Two-storey residential units are proposed at grade along the north-south Lett Street, consistent with the active façade requirement in the Secondary Plan requiring a residential frontage along this street. This residential frontage wraps the northeast corner of the site, with three residential units facing Fleet Street.



Figure 1: Proposed Ground Floor Plan

City staff have raised concerns in their comments regarding the amount of retail proposed at grade, noting that the project is required by the in-force Zoning By-law (Mixed-Use Downtown Zone or MD Zone) to provide at least 50% of the ground floor as non-residential uses, which include community centre, retail food store, restaurant, and recreational and athletic facility, among other uses. Relevant staff comments are listed below:

“8. Ground Floor Commercial Uses

a. The MD zone requires at least 50% of the ground floor to be comprised of non-residential uses. Confirm compliance and/or strategy to achieve this.

1. Note: Day Care is not listed as a use that contributes to this requirement, but staff are comfortable using this towards the requirements as it should be located on the ground floor and obligated for inclusion in this development

b. Please confirm active frontage strategy and requirement around the perimeter of this site in accordance with the Secondary Plan policies specific to the East Flats. Also, see the definition of Active Frontage in the zoning by-law.

c. Recommend adding some more commercial at grade, such as moving the gym and using this space for a commercial unit. Aim to achieve the 50% requirement, and you can use the day care towards this calculation (requires amendment).

d. Consider an alternative design approach that can have other spaces evolve into commercial over time, such as “live-work” type units? The pools are also problematic (see mid-block pathway comment). Perhaps a commercial use could help frame the pathway?” (City Staff Comments on the ZBA and SPA applications, dated September 23, 2020)

Response to Staff Comments and Rationale for Proposed Ground Floor Uses

For the reasons set out below, it is our opinion that the proposed ground floor conditions meet the intent of the City’s Official Plan and Zoning By-law.

1. The proposed ground floor uses satisfy the requirements of the Central Area Secondary Plan.

Policy 1.11.13.2(1) of the Central Area Secondary Plan states the following:

“Active frontages are required along the majority of all buildings facades at street level as shown on Map 6. Grade-accessed residential units are required along Lett Street, and all other required active frontages may be comprised of a mix of permitted uses. Residential lobbies are permitted along any frontage.”

The ground floor includes grade-accessed units along Lett Street, and commercial or residential uses comprise the other frontages.

2. The minimum 50% active use requirement is appropriate for a block in the Downtown core but not for the subject block.

Although the East Flats can be viewed as an extension of Downtown in built form terms, it is not planned to be part of Downtown's central business district, where the intensity of office uses and tourists ensure a steady volume of pedestrian traffic on nearly every street throughout the day and hotels support restaurants in the evening. The East Flats is a Downtown neighbourhood, where certain streets and key corners should accommodate commercial amenities for local residents, and ground floors should support "eyes on the street", but where not every street is expected to be active throughout the day and evening. In particular, Fleet Street, Lett Street and Lloyd Street are not intended to be commercial streets.

3. Commercial spaces are planned where it will be most suitable

The proposed development features a two-storey commercial space on the south side of the block, 303m² on the ground floor and 378m² on the second floor. The space will look onto the future City park and be close to Pimisi Station (approximately two-thirds of trips to and from the East Flats are expected to be by transit). The high levels of activity expected in the park and pedestrian traffic to and from the station should ensure the viability of the commercial space. The two-storey space has been designed to be flexible and adaptable, and may accommodate multiple tenants. A tenant has not been lined up at this stage, but Claridge foresees the space being occupied by a restaurant and/or another food-related establishment.

Along with the smaller additional commercial unit proposed on Fleet Street, the proposed commercial space on the ground floor will occupy 12.3% of the total ground floor.

Claridge has considered locating additional commercial space within this phase, but concluded it would not be viable. Phases 1-4 of East Flats will not provide the critical mass of population needed to support additional commercial space, and the volume of pedestrian traffic generated by residents and visitors will be light most days. Future phases of East Flats, on the Booth Street sites, will include a significant amount of commercial space in the podium, oriented to Booth Street, which is expected to be one of the primary commercial streets serving all of LeBreton Flats.

Note, although the grade-accessed units proposed on the north-south portion of Lett Street and a portion of Fleet Street have been designed for residential purposes in accordance with the Secondary Plan, since they are two-storey loft units, they have the potential to function as "live-work" units with home-based offices or studios, which may increase commercial activity on the ground floor.

4. The day care facility will contribute to an active pedestrian realm

Given the neighbourhood context and the challenge of sustaining commercial uses on multiple frontages at the ground level, Claridge has decided to locate a day care facility for 50 children in the

podium of the north tower, oriented to Lett Street, with an outdoor play area adjacent to the street. The day care will contribute to a lively public realm throughout the day as parents/caregivers drop off and pick up children and day care staff take children on excursions in the neighbourhood.

We understand that, although a day care is not among the active uses in the By-law that may count toward the minimum 50% ground floor requirement, City staff will consider it an active use.

The floor area of the day care is 482m², which is 15.4% of the total ground floor area.

5. Residential amenity space on the ground floor will further contribute to active frontages

Claridge's design team has also located indoor and outdoor private amenity spaces with the intention of encouraging active ground floors and supporting a safe, comfortable public realm. A fitness centre of 115m² in the podium of the north tower will face Lloyd Street, and indoor swimming pools totalling 292m² will be located along the proposed private, publicly-accessible mid-block pathway that opens up on each side of the block. In terms of the activity they generate, these facilities are comparable to a "recreational and athletic facility," which the Zoning By-law recognizes as an active use. As common spaces, the pools will help to make the pathway and adjacent open spaces feel public and will provide natural surveillance. Since the mid-block pathway, as described below, is a supplementary feature of the public realm that is not expected to be heavily used by the public, it would not be appropriate to "front" it with commercial uses.

The private recreational facilities, including a second fitness centre in the south tower, will comprise approximately 470m² in total, or 15% of the ground floor.

Mid-Block Pathway

The proposed development includes a landscaped mid-block pathway that separates the two buildings. The winding pathway links Lloyd Street and Lett Street (north-south) and features serpentine benches, gardens, and pedestrian-scale lighting (see Figure 2). This space is conceived primarily as an amenity for the local neighbourhood, a place for respite and a through-block connection. The pathway will be publicly accessible and at each end will open up to create landscaped "rooms" on Lett Street and Lloyd Street that provide both relief within the street walls established by the podiums and intimate places to sit and gather. As noted above, activity in the swimming pools, fitness facilities and day care play space, together with pedestrian-level lighting and attractive landscaping, will ensure the pathway and landscaped rooms feels safe and inviting.

The Lloyd Street landscaped room also helps to screen the ramp to underground parking, which has not been incorporated within the south tower podium to avoid a blank wall condition against the mid-block pathway and to allow the two-storey commercial space next to the ramp to look onto the landscaped room.

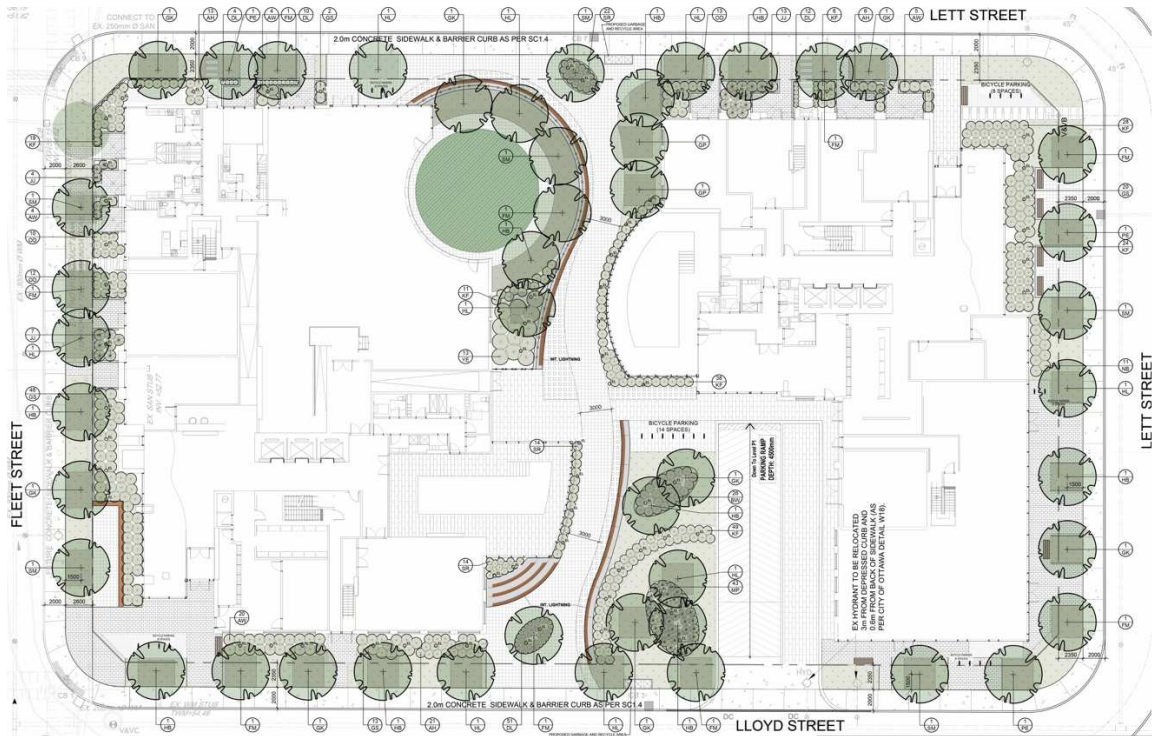


Figure 2: Proposed Landscape Plan

In response to comments from the NCC’s Advisory Committee on Planning, Design and Realty and the City’s Urban Design Review Panel, the pathway has been widened from 2.3 metres to 3 metres for improved accessibility and more openness in the middle. In our opinion, however, the space should not be opened up further, for example by relocating the swimming pools, to create a public open space with “civic characteristics”. The site is located in an area of the city rich in civic open spaces, including a variety of recreational and cultural spaces within the NCC’s open space network immediately to the north, with more civic spaces planned, including the new Central Library and Archives Building and a City park immediately south of the site (see Figure 3). There is no need for more civic open space in the neighbourhood, and, given that other public uses are not viable on the site except on the south frontage and a segment of the north frontage, a courtyard in the middle of the block larger than what is proposed would not be well used by the public.

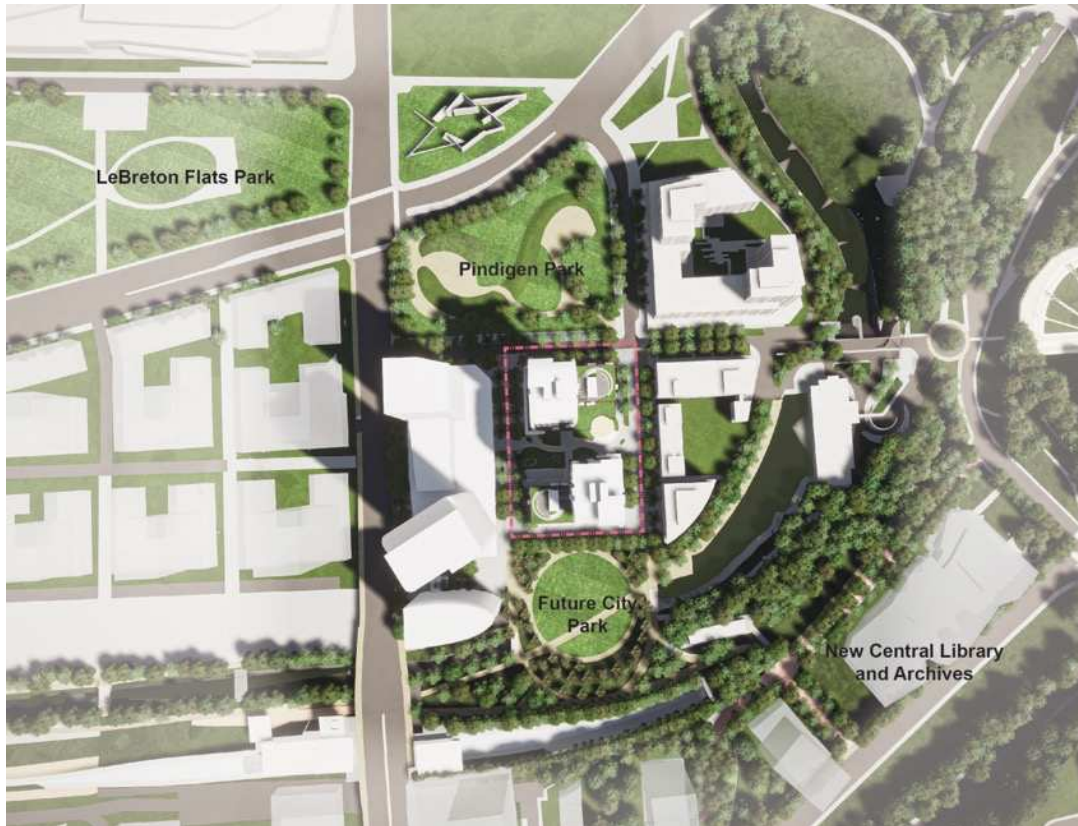


Figure 3: Bird's eye view of the proposed Phase 4 development within the existing and planned open space context.

Summary

In our opinion, the proposed ground floor uses in Phase 4 of the East Flats are appropriate, given the site's existing and planned neighbourhood context. The combination of commercial space, a day care and programmed common amenity space will ensure the ground floor is active and supports an inviting, comfortable public realm. These uses conform with the area-specific policies of the Secondary Plan and meet the spirit and intent of the MD zoning requirement for active ground floor uses. The commercial spaces and day care will occupy 27% of the ground floor, and the common amenity spaces will occupy an additional 15%.

As the East Flats further develops, along with the broader area of LeBreton Flats, the critical mass of residents and visitors needed to ensure the viability of commercial establishments will be achieved. Future phases of the East Flats on Booth Street will provide the opportunity for additional commercial amenities in a highly visible and accessible location. The shifting of Phase 4 to the subject property will help ensure there is a critical mass of people to support future businesses on Booth Street. In the

interim, Phase 4 will include two storeys of commercial space facing the future City park, which is expected to include one or more tenants that will help to address community needs.

The proposed mid-block pathway, linking landscaped rooms on Lett Street and Lloyd Street, will complement the ground floor uses. These spaces are expected to function primarily as outdoor amenity space for use by local residents but will be accessible to the broader public to encourage pedestrian activity in the area. In our view, it would not be appropriate to create a larger public courtyard space between the two buildings, given the abundance of existing and planned civic open spaces surrounding the East Flats and the residential nature of the development.

In conclusion, it is our opinion that the proposed ground floor uses and mid-block pathway represent good planning and good urban design.

If you have any questions or would like to further discuss these matters, please don't hesitate to contact me.

Yours very truly,
URBAN STRATEGIES INC.

A handwritten signature in black ink, appearing to read 'Tim Smith', written in a cursive style.

Tim Smith, RPP, MCIP
Principal