

In accordance with the Rockcliffe Park Heritage Conservation District Plan Bylaw No. 2016-89 and Part V of the *Ontario Heritage Act* The Rockcliffe Park Residents Association Heritage Committee does not support the proposed development application for 480 Cloverdale.

The proposed changes from the last submission are minor and are insufficient for the design to be compliant with the Rockcliffe Park Heritage Conservation District Plan (RP HCDP), the Rockcliffe Park Secondary Plan (RPSP), Provincial Policy Statement (PPS) and the Standards and Guidelines for the Conservation of Historic Places in Canada (S&G).

The question is not, has the applicant made changes, but has the applicant made enough changes to be compliant with the plan? The only conclusion is that they have not.

We agree with the statement submitted by Ms. Ratushny.

“The new application remains drastically non-compliant pursuant to the plain meaning and purpose of s. 7.4.2(3) of the RPHCD Plan, Bylaw No. 2016-89 and Part V of the *Ontario Heritage Act*. As the City of Ottawa is statute-bound to apply the prescriptive mandatory mass limit in s. 7.4.2(3) of the RPHCD Plan, respectfully, the City of Ottawa continues to have no legal authority to issue a heritage permit for this new application under Part V of the *Ontario Heritage Act*.”

Our submission will be divided into three sections:

Section I considers non compliance of the proposed application with the standards of the, Rockcliffe Park Heritage Conservation District Plan, (RPHCDP), Rockcliffe Park Secondary Plan, (RPSP), the Ontario Provincial Policy Statement, (PPS) and the Standards and Guidelines for the Conservation of Historic Places in Canada (S&G)

Section II, Zoning Bylaw, examines a question of compliance with the Gross Floor Area (GFA) and Floor Space index (FSI) requirements for the proposed application for 480 Cloverdale under the Zoning Bylaw. Besides not being compliant with the RP HCDP there is also reason to believe that the proposed design is not compliant with City of Ottawa zoning bylaw.

Section III, Heritage Impact Assessment (HIA) examines the various inconsistencies in the HIA submitted by the applicant and responds to some of the statements in the document.

According to the HIA submitted by the applicant, the changes for the new application are as follows:

- i) Height 8.5m Figures need clarification.
- ii) Reduction of declared **GFA** from 777.6 m² to 759.0 m² a change of 18.2 m² which equals a **2.3%** reduction
- iii) Building length reduction from 42m to 38.8m a change of 3.2m. 38.8m is over half the length of the lot

iv) Flipped the structure and flipped the garage from the northside to the south side
Flipping the garage and the structure and moving the house back by two metres changes the relationship to 484 Cloverdale, but it **does not reduce the mass**.

v) Increased front yard setback from 6.70m to 8.75m a change of 2.05m

vi) Increased the rear yard setback from 20.1m to 23.4m a change of 3.3m

Effectively the house has been moved back from the road by 2.05 m and the increased rear yard setback is achieved by reducing the length of the house by 3.2 m

vii) Material selection change appreciated but secondary to the non compliance of the application.

viii) Native Species for landscape appreciated but secondary the non compliance of the application.

Section I

1. RPHCD Plan

The proposed design does not comply with the RP HCDP under various sections but most importantly under the following:

7.4.2.3 States: *“Construction of new buildings will only be permitted when the new building does not detract from the **historic landscape characteristics** of the associated streetscape, the **height and mass** of the new building are consistent with the Grade I buildings in the associated streetscape, and the **siting** and materials of the new building are compatible with the Grade I buildings in the associated streetscape.”*

Note: It may be tempting to argue that a larger lot should have a larger home, but it is imperative to understand that the Grade I home, 484 Cloverdale is the limiting metric. Any application that is approved for this lot must be consistent with the height and mass of 484 Cloverdale.

The **mass** of the proposed design is significantly greater than the Grade I home at 484 Cloverdale on the associated streetscape¹ and many times longer. This can not be considered consistent. Note it should be the responsibility of the applicant to provide this data since it is a metric of compliance in the RP HCDP.

In an analysis of the dimensions of mass, height, length and width, all are greater than 484 Cloverdale and in all cases except height, drastically greater.

The **height** of the proposed design is required to be consistent with that of the neighbouring Grade I home at 484 Cloverdale which is the limiting factor for deciding if the proposed plan is

¹ paragraph [4]g. at page 3 of May 23, 2023 Responding/Opposing Party Cost Submissions to the Ontario Land Tribunal in OLT Case No. OLT-22-002736. Both the Applicant and the City of Ottawa are in receipt of these May 23, 2023 cost submissions. Mass analysis indicated.

consistent, **not zoning by-laws**. The applicant has not indicated the height of 484 Cloverdale. They have only indicated the midpoint of the gabled roof as 64.85m ASL (above sea level) . It is necessary to have the at grade or average grade ASL measurement in order to calculate the height of 484 Cloverdale to determine compliance with the RP HCDP. Again the onus should be on the applicant to provide this information since it is a metric required to determine compliance with the RP HCDP.

The proposed height for 480 Cloverdale is 66.81 ASL(top of roof) -58.02 ASL(average grade) =8.79m according to measurements in the Heritage Impact Assessment.

Building height means the vertical distance between the **average grade** at the base of a main wall of the **building** and

1. the highest point of the roof surface, if a flat roof (sect 54 Definitions City of Ottawa)

The **length** of the proposed design is significantly longer than the length of the Grade I home at 484 Cloverdale. The length of the proposed design is indicated as 38.8m which covers over half of the length of the lot and is approximately 4 times in length of the Grade I home at 484 Cloverdale.

The **width** of the proposed design occupies over half of the width of the 480 Cloverdale lot. The proposed width is greater than that of the Grade I home at 484 Cloverdale.

7.4.2.4. “New buildings shall be of their own time but **sympathetic** to the character of their historic neighbours in terms of massing, height and materials.”

Response: The proposed design is *not* sympathetic to the character of its historic neighbours in terms of massing, height and materials.

5.0 Statement of Objectives

To ensure that new house construction is compatible with, sympathetic to and has regard for the height, massing and setbacks of the established heritage character of the streetscape in order to conserve the character and pattern of the associated streetscape, while creating a distinction between new and old.

Response:

The character and pattern of the associated streetscape along Cloverdale and other connecting streets is square based house forms that are sited or organised on the edge of their lots and not extended rectangular forms sited along the depth/length of the lot as is the case for the proposed design for 480 Cloverdale. This application therefore has no regard for and is not compatible with or sympathetic to the established heritage character of the streetscape.

6.0 Statement of Cultural Heritage Value

Statement of Cultural Heritage Value and Heritage Attributes

*The preservation and enhancement of topographical features including the lake and pond, the **internal ridges and slopes**, and the various rock outcroppings, has reinforced the original design intentions.*

Response: One of the defining features of this lot is the topography which cascades down from the road towards the tennis courts. The length of the proposed design excessively disturbs the existing topography by placing a massive structure that does not follow the downward flow of the hill but instead clashes with the topography by obscuring it.

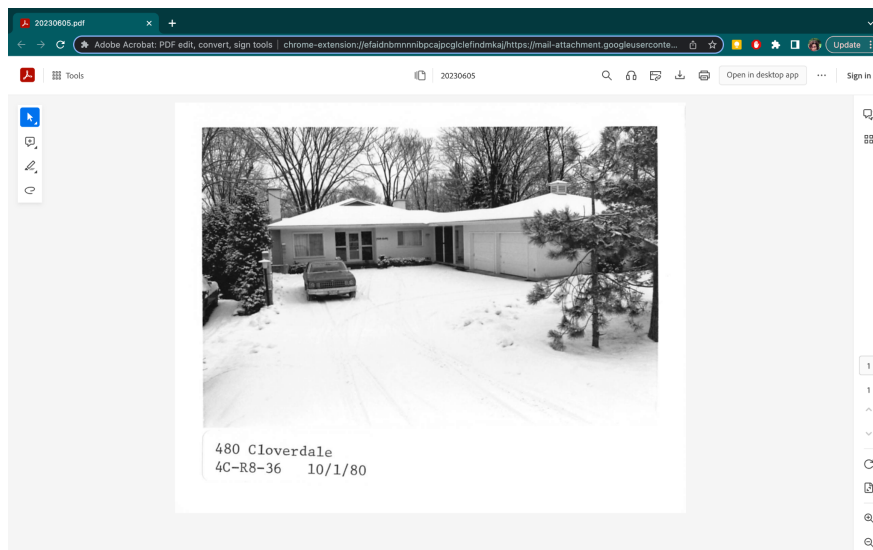
Statement of Heritage Attributes

*The **unobtrusive** siting of the houses on streets and the generous spacing relative to the neighbouring buildings;*

Response: This means the house should not attract attention. This house attracts attention because of its excessive mass which interferes with the green landscape along the length of the lot.

The proposed design also needs to be evaluated not just for the excessive mass of the building, but the impact that this excessive mass has on the preservation of the green landscape of the lot. While many of the trees will be preserved, the flow between the trees to open space and the park-like setting will be obscured by the excessive mass.

The previous house on the 480 Cloverdale lot was a bungalow which was smaller in scale, height and mass and was nestled among the trees. (see below) The proposed design is not unobtrusive. The cascading topography is lost by the extending mass of the proposed house.



7.0 Policies and Guidelines

The purpose of the following sections is to ensure that all change is sympathetic to individual buildings, the adjacent properties and the value of the HCD as a cultural heritage landscape.

7.1.1. The distinct heritage character of Rockcliffe Park, as defined in the “Statement of Cultural Heritage Value,” and “Description of Heritage Attributes” **shall be maintained and enhanced.**

7.1.2. The unique cultural heritage landscape of the heritage conservation district, including both public and **private** lands, **shall be conserved and enhanced.**

7.4.2 Guidelines for New Buildings

7.4.2.2 New buildings **shall contribute to and not detract** from the heritage character of the HCD and its attributes.

Response: The proposed design does detract and does not conserve or enhance the cultural heritage landscape of the HCD. The language used in these three sections is very strong and does not provide an option to disregard. To approve this application would be in violation of these sections of the RP HCDP bylaws.

7.4.2.6 To ensure landscape continuity, new buildings should be sited in generally the same location and be oriented in the same direction as the building being replaced to ensure that the existing character of the lot, its associated landscape and the streetscape are preserved.

Response: The photo above and Ottawa Citizen newspaper article below indicate there was a bungalow on this property previously, which did not extend as far back as the proposed design. The bungalow was not substantial in mass like the proposed design since it was a single storey structure and had a smaller more compact footprint as opposed to the two storey structure at the front and the three storey structure being considered.

Ottawa Buzz

Technology entrepreneur **Philip Garel-Jones** and his wife, **Beata**, have paid \$2.8 million for two neighbouring houses in Rockcliffe Park. They plan to knock them down and build a large new home, as **Antoine Paquin**, another technology millionaire, did two years ago. “We’re just doodling with what we might do, but we hope to build in 2004,” says Mr. Garel-Jones, a co-founder of JDS Uniphase.

Both purchases were completed in early July. The couple paid \$1.525 million for a stone house at 454 Cloverdale Rd. It was owned by Dr. **Jay Lazaro** and **Margaret Hamblin-Lazaro**, parents of **Katie Lazaro**, the 22-year-old university student who was slain in Philadelphia in late July. Mr. and Mrs. Garel-Jones paid \$1.275 million for the bungalow next door, at 480 Cloverdale Rd. It was owned by **Graham** and **Evelyn Sadler**.

Ottawa Citizen article Oct 4, 2002

7.4.3 Landscape Guidelines – New Buildings and Additions

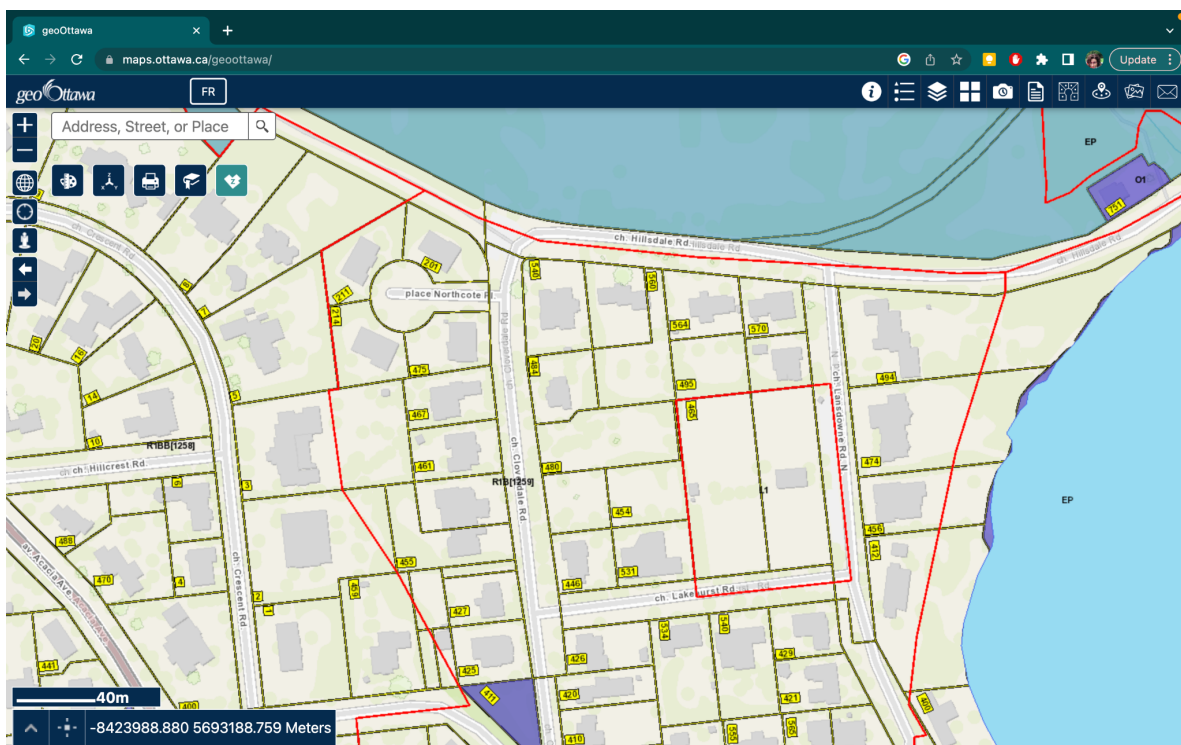
7.4.3.1 New buildings and additions to existing buildings **shall respect the heritage attributes** of the lot's existing **hard and soft landscape**, including but not limited to trees, hedges and flowerbeds, pathways, setbacks and yards. Soft landscaping will dominate the property.

7.4.3.3 The existing landscaped character of a lot **will be preserved**, when new buildings and additions are constructed.

Response: Soft landscaping will not dominate this property the mass of this structure, which will be visible through the trees especially in the winter, will dominate. The landscape character of this lot is a descending hill that is negated by the horizontal and vertical lines of the proposed design which obscures the profile of the hill. Neither the hard nor the soft landscape heritage attributes of this lot will be preserved. Again the strong language in these sections of the RP HCDP bylaw does not permit disregard. To approve this application would be in violation of these sections of the RP HCDP bylaw.

7.4.3.4 The front lawns and side yards of new buildings **shall protect the continuity and dominance of the soft landscape within the HCD**.

Response: Despite the retention of many of the trees on this lot, the length of the proposed structure has only been reduced by 3.2 metres and is still too long and visible amongst the trees all along the side yards which will have an impact on the viewshed of 484 Cloverdale, the tennis courts at the rear and 560 Hillsdale and 446 and 531 Lakehurst.



GeoOttawa screenshot of the houses forms and land use patterns along Cloverdale, Hillsdale, Lansdowne N. and Lakehurst.

*7.4.3.10 Existing grades **shall be maintained**.*

Response: It is not clear if the proposed plan will conserve the grades. There is a mound or berm on the south side of the lot. Are these pre-existing or a change in grade?
If they are a changes in grade, this is not permitted by the RP HCDP

Section 1

2. Rockcliffe Park Secondary Plan (RPSP)

It remains the City's intent to protect the present environment, to permit modest change and to conserve, restore and maintain the quality of the landscape and built form according to the policies and guidelines in the Rockcliffe Park Heritage Conservation District Plan.

Response: The city has clearly stated in the RPSP which forms part of the City of Ottawa New Official, that its intent is to protect the present environment [in Rockcliffe Park] and to permit only modest change. The proposed application for 480 Cloverdale can not be considered a modest change to the lot; it would not conserve or maintain the landscape according to the RP HCDP. To approve this application would be to disregard the RPSP and therefore part of the New Official Plan.

2.4 Environmental Principles

The preservation of the environment, particularly where forest or wooded areas exist, requires special consideration when new development and public works are proposed. It is the City's intent that the natural landscape amenities of Rockcliffe Park be preserved or enhanced. Buildings, municipal services, site development, parking, and streets can adversely affect densely vegetated areas.

Response: The City acknowledges in the RPSP that buildings can adversely affect densely vegetated areas and the preservation of wooded areas when new developments are proposed. This application as proposed would have an adverse effect on this lot and therefore the heritage attributes of the HCD.

Section 3: Goals and Objectives of the Secondary Plan

1. Maintaining Compatible Form, Density and Character in Rockcliffe Park

2. Encouraging Quality Design and Consistency within neighbourhoods

Guidelines for the design of new Infill Housing can be found in Section 7.4.2 of the Rockcliffe Park Heritage Conservation District Plan. These guidelines are intended to encourage high quality of design and consistency with predominant housing forms.

Response: The proposed design is not consistent with the predominant housing forms on Cloverdale, Hillside, Lansdowne N and Lakehurst.

Section 1

3. Provincial Policy Statement (PPS)

1.7.1 Long-term economic prosperity should be supported by:

e) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by **conserving features that help define character**, including built heritage resources and **cultural heritage landscapes**;

2.0 Wise Use and Management of Resources Ontario's long-term prosperity, environmental health, and **social well-being depend on conserving** biodiversity, protecting the health of the Great Lakes, and protecting **natural heritage**, water, agricultural, mineral and **cultural heritage** and archaeological resources for their economic, environmental and social benefits.

2.6 Cultural Heritage and Archaeology

2.6.1 Significant built heritage resources and significant **cultural heritage landscapes shall be conserved**

In order to fully understand the cultural heritage landscape that shall be preserved, consider the following definitions from the PPS

Cultural heritage landscape: means a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Indigenous community. The area may include features such as buildings, structures, **spaces, views**, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association. Cultural heritage landscapes may be properties that have been determined to have cultural heritage value or interest under the Ontario Heritage Act, or have been included on federal and/or international registers, and/or protected through official plan, zoning by-law, or other land use planning mechanisms.

Response: This describes well what the HCDP bylaw seeks to preserve. Not only the natural elements such as the tree canopy, but the space in between and the views that flow through. The excessive mass of the proposed structure conflicts with the cultural heritage landscape protected under the RPHCD Plan bylaw.

Heritage attributes: means the principal features or elements that contribute to a protected heritage property's cultural heritage value or interest, and may include the property's built, constructed, or manufactured elements, as well as **natural landforms**, vegetation, water features, and its **visual setting** (e.g. significant views or vistas to or from a protected heritage property).

Response: This serves to illustrate the importance of a property's natural landform, its vegetation and its visual setting which form part of the attributes of the lot within the greater whole of Rockcliffe Park which shall be preserved. This application does not succeed in preserving these attributes.

Section 1

4. Standards and Guidelines for the Conservation of Historic Places in Canada

4.1.3 Land Patterns

Land pattern refers to the overall arrangement and interrelationship of the larger-scale aspects of a cultural landscape, whether natural or human-made.

*Land patterns help us understand how naturally occurring elements, such as forests, meadows, rivers, lakes, **hills** or valleys, fit together and fit with human-made elements such as farm fields, pastures, **significant built features** and major circulation systems.*

Recommendation 13

*Designing a new feature when required by a new use that does not **obscure**, damage or destroy **character-defining** land patterns,*

*Not recommended Introducing a new feature that is **incompatible in size** ... with the land pattern.*

Response: What is the character defining land pattern of RP? One of the character-defining land patterns of Rockcliffe Park is houses nestled in a park-like setting. This is a key design principle of the Picturesque tradition. From the HCDP This individual lot is part of a larger whole and forms part of the Cultural Heritage Value and Heritage Attributes of Rockcliffe Park. The actions on one lot have an effect on the larger whole of Rockcliffe Park.

Does the proposed design interfere with this land pattern? Yes, the proposed design obscures the land pattern (houses nestled in a park) by having a mass which dominates the land and therefore negates the principles of Picturesque design.

4.1.4 Spatial Organization

Landscape features, whether natural or human-made, can define the volume of an outdoor space.

*In urban heritage districts, land use, **buildings**, streets and topography often **define or influence spatial organization**.*

Because buildings and their landscapes [are] often designed together, it is important to understand and respect their relationships.

Response: The proposed design for 480 Cloverdale will negatively define the volume of the outdoors space in Rockcliffe Park by interrupting the spatial organization which is flowing green landscapes with generous spacing from one property to the next. The minimum zoning bylaw requirement for side yards is 4.5 metres; the proposed setback is scarcely more than the minimum and can not be considered generous. The enormous mass, the long length and the

increasing height of the proposed house as it descends the hill, intensifies the negative effect further by creating a barrier.

4.1.5 Visual Relationships

They pertain to the visual relationships between an observer and a landscape or landscape feature (a viewscape) or between the relative dimensions of landscape features (scale).

The visual relationships between elements of natural or designed landscapes, or heritage districts, can influence the user experience. For example, a tall building in a low-rise heritage district may be perceived as out of scale.

Recommended 15 Designing a new feature when required by a new use that respects the historic visual relationships in the cultural landscape. This can include matching established proportions and densities, such as maintaining the overall ratio of open space to building mass in an urban heritage district when designing [a] building.

Not recommended Introducing a new feature that alters or obscures the visual relationships in the cultural landscape,

Response: The proposed design is out of scale with the Grade I home it is meant to be consistent with. In reference to the view from the public realm of the tennis court, most of the trees at the back of the lot are deciduous trees that lose their leaves. See landscape report. The proposed house, which is 3 stories at the rear, will be highly exposed to the tennis courts and thus from the street on Lansdowne Road N. Note the treed backyard referred to belongs to 560 Hillsdale Rd. The rear lot line of 484 Cloverdale is set much further back from the tennis courts than the rear lot line of 480 Cloverdale.

4.1.9 Landforms

Recommended 13

Designing a new feature when required by a new use that is compatible with the character-defining landform.

Not Recommended Introducing a new feature where it may alter the character-defining landform. This could include failing to provide proper drainage for a new feature, resulting in the decline or loss of an historic landform.

Response: The topography of this lot is part of its defining character. There is no grade/gradient study provided for the proposed design so it is not possible to understand the impact on this landform. A grade study is necessary to ascertain compliance.

4.1.11 Built Features

Recommended 15

Designing a new built feature, when required by a new use, to be compatible with the heritage value of the cultural landscape.

Not recommended: Locating a new built feature in a manner that undermines the heritage value of the cultural landscape.

Response: The proposed design of 480 Cloverdale undermines and is not compatible with the heritage values of the cultural landscape.

Section II Zoning non compliance

While Zoning compliance is necessary, it is important to note that this application must be judged by the compliance of the RP HC DP which is the more limiting by law therefore compliance with the zoning bylaw does not mean it is compliant with the RP HC DP.

In addition to not complying with the RP HC DP there are questions as to whether the development application is compliant with City of Ottawa Zoning bylaws .

According to the HIA the floor area of the lower floor is not included in the total GFA. The ground floor of the proposed design does not qualify as a basement and thus must be included in the GFA and FSI calculations.

Note the definition of the basement should be the second definition since we do not fall in schedule 348.

Basement *In all other parts of the City [Rockcliffe Park], that level of a building having more than half of its floor to ceiling height below **grade**, (sous-sol) (By-law 2015-191) (By-law 2015-281)*

Very little if any of the lower floor has "more than half of its floor to ceiling height below grade" The height of this floor is almost entirely above grade not *average* grade.

Through the Heritage planner we have asked the applicant to clearly demonstrate the GFA figures for each of the floors separately including the lower floor. The applicant should also include the area under the dining room/pond feature as well as the double height space bridging space between the two wings as required by exception 1259. GFA should include "potential floor area that is the area of a floor that is projected from an actual floor of a storey that is above the floor area of another storey or basement" (*Section 54 Definitions-Zoning Bylaw*)

We have yet to receive a response from the applicant.

FSI is defined as GFA/lot size. The proposed design is at the lot limit of .375. If the GFA of the lower floor and the overhang space are included, then the FSI will be drastically exceeded. For

example if 200m² were added to the current GFA 759m² + 200m²= 959m² the new FSI would go from .365 to .461

Section III Response to the Heritage Impact Assessment

(page number refers to PDF numbering italics are quotes from the HIA)

p4 says the property has never been developed.

Response: Yes the property has been developed before. Please see attached photo and quote that indicate a bungalow was a structure previously on the lot.

p14 The massing of the building is broken-up into a series of linked pavilions scaled to increase from a 1-1/2 storey garage wing at the street, with a two-storey portion extending into the lot.

Response: The proposed house is not a 1 ½ storey garage, it is two storeys and extends to 3 floors at the rear of the lot. See HIA p. 6 diagram

p14. The scale and siting of the home is respectful of the scale of the adjacent house at 484 Cloverdale Road and appears much less massive than buildings across the street.

Response: Other houses are not relevant, 480 Cloverdale is to be consistent with 484 Cloverdale. A house that is many times the grade I house is not respectful of the scale.

p14 This home takes full advantage of its setting with a GFA of 759 m² including ground floor and second floor. This is a reduction from previous submissions where the GFA was 777.6 m². The basement floor area does not count towards total GFA as per City of Ottawa Zoning By-Law Exception 1259.

See Zoning non compliance and reduction in GFA of 18m² is not significant, it is barely 2%

p15 What is the large berm in the south elevation? Also not 1 ½ storey

p16 /p24 North Elevation from the neighbouring property. On the north side of the property, the proposed home is set back over 23 metres from the street property line to the extent that its' front edge is in the rear yard of the adjacent property.

Response: 23 m is misleading. They make a distinction between the house and the garage when they are one and the same. The living quarters/house structure may be at a setback of 23m from the road, but the structure itself beginning at the garage is only setback from the road, a declared 6.7m (table page 6 of HIA) or is it 8.75m page 20 HIA which is a similar setback to 484 Cloverdale?

p16 *With the natural grade change over the property the east portion of the basement sits partially out of the ground.*

Response: The HIA admits that the ground floor sits partially out of the ground. So that portion needs to be included in the GFA and FSI calculations.

p17 The image is inconsistent with the elevations perhaps reversed? And there is a terrace with a railing and steps. Is this an old image?

p19 *Figure 17: Perspective view of the east elevation from the tennis court will appear much the same as the well treed backyard at 484 Cloverdale will remain unprogrammed. Source: Linebox Studio 2023*

Response: Except most of the trees at the back of the lot are deciduous trees that lose their leaves. See landscape report. The proposed house, which is 3 stories at the rear, will be highly exposed from the tennis courts and thus from the street on Lansdowne Road N. Note the treed backyard referred to belongs to 560 Hillsdale Rd. The rear lot line of 484 Cloverdale is set much further back from the tennis courts than the rear lot line of 480 Cloverdale.

p 20 • *There has been no grading plan prepared at this time. The existing grading plan, and we will be working with the existing grades and contours to enable maximum tree protection ,*

p 24 *The existing grades are largely maintained;*

p 27 *Setbacks, topography and existing grades, trees, pathways, and special features, such as stone walls and front walks shall be preserved.*

p 28 *Changes to grade are limited and will occur along the driveway (slices topography) with minimal impact.*

p29 *The existing grades are maintained*

Response: Whether the applicant is preserving the grade or not is important to know especially since changing the grade affects the topography of the site which is an important heritage landscape attribute which shall be preserved and grade changes are not permitted.

The HIA is inconsistent in its statements.

p 21 *As per the General Standards (all projects) 1. Conserve the character defining elements of a historic place; The existing topography, views and viewsheds in and out of the site, the vegetation, and the property in context with the HCD are considered to be character defining. A guiding principle is the retention of the wooded area and its topography.*

Response: Views and viewsheds are not conserved. Open space is taken up by the mass. See comments on topography above.

p 21 3. *Find a use for a historic place that requires minimal changes to its character defining elements. The introduction of a family residence requires minimal change to the defined attributes on site...*

Response: The proposed residence requires vast changes to the attributes of this property. The proposed mass drastically interferes with the open space of this lot and the park-like setting of the RPHCD as does a building that does not step down with the property.

p 22 The proposal is consistent with these Standards. The heritage value of the HCD is conserved, as viewsheds in and out of the property are curated to maintain the visual continuity between lots.

Response: Viewsheds in and out of the property are not conserved given that the house stretches along the majority of the lot. View shed is not preserved given the excessive mass of the proposed structure.

p 22 The new house as a feature in the Rockcliffe cultural landscape is compatible in massing and scale with the District's spatial organisation and is respectful of the neighbouring home at 484 Cloverdale.

Response: The spatial organisation proposed has too great a mass and does not follow the spatial organisation of other lots where structures are compact and not sprawled out. Note the proposed design is not respectful. Plus beyond "respectful" the proposal must be **consistent**.

p 24 The proposed house is also compatible with the existing streetscape in its height, dimensions, and function as a private family residence.

Response: 480 Cloverdale is not compatible in dimensions with 484 Cloverdale. It is higher, longer and much greater in mass.

p 24 At the same time, the reduced footprint provides a larger green soft landscape along the north edge of the property and to the rear.

Response: There has only been a GFA reduction of 18.2m² for the entire project, an insignificant reduction in footprint. Flipping the garage does not in itself reduce the footprint or mass of the home; it merely moves it away from 484 Cloverdale.

p 25 New scheme reduces the building length, with lot coverage reduced to 22%;

Response: The previous lot coverage was 22% so it is unchanged. With only an 18.2m² reduction in GFA on the ground floor or another floor it is obvious that not much reduction of lot coverage has occurred. The overall length of the building has been reduced by 3.2m still leaving a significant 38.8m.

P26/30 This submission has taken into consideration the community comments with regard to earlier submissions and has responded with a new design incorporating mitigation measures to address these concerns by flipping the mass to the south side of the property and reducing the length and height of the building.

Response: It is not clear if the building height has been reduced or not. Building height reduced to 8.5 m see table on PDF page 6 of HIA original shows at 9m.

The *original* north side elevation ground level is indicated as 60.02m ASL. In the new proposal ground level is indicated at 59.7m ASL a difference of 32 cm. Why is that?

The average grade has also changed. The average grade was 58.22m ASL and now it is indicated as 58.02m ASL difference of 20cm. There is something wrong here.

HIA and response to clarify height is misleading. 66.81(top of roof) -58.02 (new average grade) so Height is 8.87m

Given that height is an important metric required by the HCDP to judge compliance. The height of the proposed design needs to be clear.

P27 eliminating a roof terrace

Response: The rooftop terrace still appears in Figure 14 on PDF page 17 of the HIA.

P28 The most-recent scheme described in this HIA have responded to recommendations with a smaller footprint, less height, and fewer areas where the topography has been altered. (See the chart in section 4.5 for a comparison of stats of previous and the current submission

Response: The numbers do not add up so there is not a clear picture of what is being presented for approval. Has the topography been altered or not?

p 29 preservation of the existing vegetation.

Response: Vegetation may be preserved but flow between vegetation is interrupted vastly by mass and thus does not preserve the very important heritage attribute of open space.