

May 5, 2025

**Eric Forhan**

Planner, Development Review Central  
Planning, Real Estate and Economic Development  
110 Laurier Ave West | 4th Floor | Ottawa, ON | K1P 1J1  
City of Ottawa | Ville d'Ottawa

**Re: Applications for Site Plan, Zoning By-law Amendment, and Heritage Permit  
254 Argyle Avenue, Ottawa, Ontario**

Dear Mr. Forhan,

I have prepared this letter in response to receiving notice regarding the aforementioned applications related to the redevelopment of the subject lands. As a neighbour to the subject lands for over 10 years and an experienced Ottawa based developer, I offer the following areas of concern with the proposed development and associated applications.

**Rear and Side Yard Setbacks**

While I recognize that the Secondary Plan allows for a maximum height of nine (9) storeys on the subject lands, Official Plan policies related to sensitive transition of built form dictate that development design on such narrow and shallow sites, such as 254 Argyle Avenue, be more sensitive to their context.

The proposed design requires setback relief on all four (4) sides of the building with 1.5 m side yard setbacks and a 5-metre rear yard for the entire 9-storey mass. The impact of such mass in proximity to 252 Argyle Avenue cannot be understated. 252 Argyle Avenue is a three (3) storey, mixed-use building with residential and office uses. At present, the building is limited in its natural light and overlook exposure from the height and limited setback of the 23-storey development to the south. Adding a nine (9)-storey building to the west with such limited setbacks will exacerbate this existing situation to the point of unreasonableness.

The submitted Rationale from Novatech, identifies Policy 2 of Section 4.6.6 of the Official Plan which identifies the need for gradual changes in height and massing between mid and high rise buildings and adjacent neighbourhood designations through the use of stepbacks and setbacks. However, the response to this policy, is to simply state that the subject lands are adjacent to tall buildings to the west and south while suggesting that the existing lower buildings in the area are anticipated to redevelop with taller buildings themselves.

While this may be true, it is not an appropriate response to Section 4.6.6 as this policy requires consideration of design approaches (setbacks and stepbacks) to the existing context, which in this case may not easily change given the presence of the Heritage Conservation District.

It is also important to note that the Mezzanine in the current proposal is being treated as a floor, when in reality it is far from it. A 3 storey atrium as contemplated by the proposed design is not within the intent of the zoning and simply serves to artificially hide the building's overall height through the masking of the true number of stories.

The primary office tenant at 252 Argyle Ave. is Figurr Architects, who started their tenancy in the fall of 2024. Figurr along with Fotenn Planning and Design were retained by the previous owner of 254 Argyle Ave. to consult with City staff on redevelopment alternatives for the subject lands in the spring of 2020. These discussions were preliminary in nature and subject to further refinements and concessions through the City Approval process. The Figurr designs were a more appropriate and sensitive response to the policy direction as they proposed a nine (9) storey building with a staggered rear yard setback of 7-7.5 metres and a 3 m side yard setback above the fourth storey. This design approach provided reasonable relief and appropriate transition to 252 Argyle Ave. while also allowing for at grade, rear amenity space to the future residents of the proposed building. A section of the Proposed development currently being contemplated compared to the previous work done by Figurr is included and attached in Schedule A.

### **Treatment of the Heritage Building**

The proposed development involves retaining and relocating the existing façade and sides of the Eglise Christ Roi church such that it will be repurposed as the street facing entrance to the new building and function as a wine bar. While the preservation efforts are commendable, they can hardly be considered preservation.

Firstly, part of the unique value of the old church was the setback from the street which opened a front landscape / garden area to the street that uniquely drew the public eye to both the church and the religious statute that previously existed in the front yard. To move the church forward serves to ignore the true heritage value of this relationship of the building to the open space street front relationship.

Secondly, the ability to successfully move or more likely rebuild the façade of the heritage building in a manner that preserves the true character and integrity of the church is questionable and causes one to question if this is just facadism that is not appropriately respecting the heritage value of this building. This is even further challenged by the lack of any access over the lands of 252 Argyle Ave.

### **Reduced Front Yard and Impacts to Existing Mature Vegetation**

As a direct result of the choice to move the church and reduce the front yard setback of the proposed building so that it ranges from 1.5 – 5.4 m will result in the sacrifice of a beautiful, healthy mature tree in the northeast corner of the subject lands. While trees are commonly sacrificed for development, the tree in question, is the first of a string of trees that make up an important part of the heritage character along the south side of Argyle Ave. east of Bank Street where heritage buildings are setback from the street with generous front yards that yield to this consistent and increasingly rare tree canopy.

In comparison, the aforementioned Figurr design for these lands, proposed a building with a much more generous front yard setback ranging from 3-7 m. This design was respectful of the existing street front character and would allow for a reduced but still generous front yard that would allow for a more sensitive and successful transition of built form and landscaping along this section of Argyle Ave.

In conclusion, while I do not object to the development of a new mid-rise building on the subject lands, I hope that the concerns that I have raised will give Planning and Heritage staff sufficient reason to require the applicant to implement significant changes to the design of the building to improve how it transitions and integrates into its context in a manner that better respects the adjacent properties and the unique and valuable heritage character of this section of Argyle Ave. Should you have any questions regarding aspects of this letter, please feel free to contact me at 613.983.2969.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Josh Zaret', with a stylized flourish extending to the right.

Josh Zaret  
President and Owner  
Big Rock Management Ltd.  
252 Argyle Ave. | Ottawa, ON | K2P 1B9