Civic Hospital Neighbourhood Association

Aug 22, 2023

Ottawa City Council
110 Laurier Avenue West
Ottawa ON
K1P 1J1

Council Meeting Aug 23 - Zoning By-law Amendment – 1081 Carling Avenue

Dear Mayor and City Councillors,

On Wednesday you will be asked to approve a zoning by-law amendment for 1081 Carling Avenue. No doubt you are already aware of serious concerns voiced by Agriculture and Agri-Food Canada (AAFC) that the planned development jeopardizes important crop research focused on climate change mitigation at the Central Experimental Farm (CEF), a National Historic Site.

The applicant seeks approval to build two high-rise towers at 1081 Carling Avenue in Ottawa, across the street from the CEF. Scientists at the CEF have produced shadow study reports that show **serious negative effects on CEF research rendering 28 hectares no longer useable for research.** (a copy is provided along with this letter). Other similar proposals are expected, and they will have a cumulative effect on the CEF's viability.

The CEF shadow studies are far more accurate and comprehensive than the limited studies submitted by the applicant to the City of Ottawa. The City's "Terms of Reference Shadow Analysis" do not address the shadow impacts appropriate for agricultural research land. The CEF fields are agricultural outdoor laboratories, not parkland. The CEF report states that the proposed towers will cast **unacceptable levels of shadows** on CEF fields used for crop research, **jeopardizing critical climate mitigating research**. These stated effects have not been reconciled with the applicant's position that the farm is not impacted.

Despite the fact AAFC provided submissions to the application, the City failed to provide advance notice via email or letter communication to the AAFC that this proposal was going to planning committee on August 16. This is a procedural breach, that in addition to the substantive concerns noted in this letter, requires the matter to be put on pause so appropriate notice can be given to AAFC—and allow for the AAFC to make submissions or be consulted as a delegation.

As Agriculture and Agri-Food Canada's concerns have not been properly reviewed and addressed, we request a 2 month delay to Council's decision on this matter to allow Agriculture and Agri-Food Canada to meet with the City, to understand and evaluate the concerns in detail, and determine an approach that protects the integrity of AAFC research and minimizes the impact on this and future developments.

As many councillors are all too aware, the City and province are dealing with a **housing crisis**. However, a 2 month delay on this application will not impact the City effectiveness in dealing with the crises as the applicant does not plan to start building on this site for 5 years.

In addition to being in a housing crisis, the City has declared that we are in the midst of a **climate emergency** and as such, all developments need to be reviewed with that lens. The City also has an **obligation** under the Official Plan (Section 4.5.2) and the Provincial Policy Statement 2020 (Sections 1.71, 2.61 and 2.6.3) **to protect and conserve the cultural heritage attributes of heritage properties.**

This isn't a case of all or nothing. Informed changes to the application will allow the City to strike the right balance between the need to intensify with the need to preserve a critical climate change resource and National heritage property.

Sincerely,

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