

Civic Hospital Neighbourhood Association

*Comments regarding
The Ottawa Hospital Site Plan
Phases 3/Main Building and 4/Central Utility Plant
January 20, 2023*

The Civic Hospital Neighbourhood Association (CHNA) has invested countless hours over the past few years working with The Ottawa Hospital (TOH) to ensure that the new Civic Campus is a success. Like most people in Ottawa and the region, our members have benefited from the exemplary healthcare provided by TOH and the University of Ottawa Heart Institute.

This document provides our initial observations and recommendations on the recently available TOH Phase 3 and 4 Site Plan Application [File No. D07-12-22-0168](#). Given the limited time for analysis, we have focused our response based on our many years of experience living alongside the current Civic Campus as well as its future home.

As changes to the application and a public information meeting are expected before this Site Plan goes to Planning Committee, we may provide further comments, clarifications, and recommendations in subsequent submissions, in particular with respect to transportation matters. We remain concerned about the traffic impact in the neighbourhood notwithstanding the recent findings by Parsons; in particular the impact on Parkdale, Sherwood and adjacent streets. Our position is that the five transportation strategies under development are lacking detail and we do not support at this time.

Karen Wright – President Civic Hospital Neighbourhood Association

Alison Taylor – Board Member

c.c. Councillor Jeff Leiper
Councillor Riley Brockington
Yasvir Naqvi, M.P. Ottawa Centre
Joel Harden, M.P.P. Ottawa Centre
Tobi Nussbaum, CEO National Capital Commission

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¹ Email from Sean Moore, City of Ottawa to Alison Taylor, CHNA.

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Transparency and Accountability

Transparency

This submission is one of many we have provided for this project over a number of years. As Phase 3 and 4 represent key planning elements, it is timely to take stock of the process. Based on our experience, there has been a distinct lack of transparency in the process in a number of areas.

- It is not clear what and when are the key decision points and by whom - NCC, City Planning and Housing Committee, Provincial Government, Parks Canada or other federal departments, if any?
- Where is the strategic implementation plan including key milestones? The documentation e.g. planning rationale only includes past milestones.
- Lack of an integrated 3D model that clearly shows the relationship between the new buildings and the surrounding landscape and buildings.
- Highly technical reports should have a clearer narrative to interpret the findings to non-technical audiences (i.e. Geotechnical and Hydrogeological Investigation).
- The planners should present the documentation in a clearer and more accessible way to find documents and key content: i.e. provide executive summaries for documents longer than 10 pages and a clear map to all the documentation to clearly show what information is found where.

CHNA Position: *A copy of any resulting reports prepared as a result of public consultations should be shared with the public.*

Accountability

Nowhere in the Phase 3 and 4 supporting documentation or previous documentation has there been a clear explanation on reporting relationships between the Hospital, NCC, City and Provincial governments. This is important to understand how TOH is accountable. The NCC has established the performance criteria for the project but it has not been included in Phase 3 and 4 documentation nor has it been shared with the Ottawa Hospital Community Advisory Council. It is unclear whether it has been shared with the City and provincial and federal departments (e.g. AAFC, Parks Canada) or with other community-based groups. It is also unclear whether there are other performance criteria in existence. The NCC performance criteria are attached as Annex A. For example, the NCC criteria states that: "**Project Integration with**

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its urban, natural and heritage context – the Proponent must demonstrate that the proposal integrates harmoniously with its setting – physically, visually, operationally and experientially throughout all development phases.” Despite the plethora of documents, it is unclear how the proponent will comply with the NCC criteria.

CHNA Position: *There needs to be a clear strategy to ensure compliance. The plan should include planned reporting against the NCC performance criteria (Annex A) and to whom such reporting will be provided.*

The NCC performance criteria should be published publicly, together with a strategic plan including key dates for decision making and reporting to the public and to the City of Ottawa Planning and Housing Committee.

The City of Ottawa Planning and Housing Committee should request quarterly reports on progress against the performance criteria from the NCC.

The progress reports should be shared with the Ottawa Hospital Community Advisory Council and other community based groups.

Community members should be invited to a more formal presentation of the plan rather than asking for feedback on an overwhelming number of unclear documents posted to a virtual self-serve site.

Accessibility

A set of Design Principles were developed by the applicant to inform the overall design and character of the hospital. Briefly, they are:

- Achieve Design Excellence in Urban Design
- Protect and Enhance Views
- Respect and Enhance the Cultural Experience
- Create a Sense of Place
- Ensure Accessibility and Connectivity for all Modes
- Provide Context-Sensitive Landscape Design.

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It is stated² that Universal Accessibility is a key principle for the TOH. Specifically,

“The Site is being designed to achieve universal accessibility that improves the experience for all hospital users including people with disabilities and functional limitations. The design will achieve connectivity of accessible spaces, facilities, control and communications, ensuring complete access for all people accessing the NCD. The objective for the NCD is to surpass to the greatest extent possible, the minimum technical requirements of the Ontario Building Code (OBC), the Accessibility for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards Regulations (IASR), the City of Ottawa Accessibility Design Standard (COADS), as well as the CSA B651 Accessibility of the Built Environment Standard. The NCD project team will look towards leading best practices in Universal Accessibility of the built and virtual environments to ensure the facility meets the needs of the greatest number of users. In addition, the NCD project team will ensure the Site Plan addresses the approach and access needs of the greatest number of users, including people with a wide range of disabilities, seniors and elderly persons, families and children – whether they are arriving on foot or by bike, via public transit, ParaTransit, private car services (e.g., taxi, Uber, Lyft, etc.), volunteer driver organizations (e.g., Sunshine Coach, etc.) or by personal vehicle. The Universal Accessibility strategy applies to all elements of the NCD project; it applies to IT and technology, ensuring the needs of people with a range of information and communication disabilities are addressed through the inclusion of assistive listening systems and video relay technologies are available wherever communications are integral (i.e., information, registration, admitting, etc.).”

Additionally, the NCC Performance Criteria (see Annex A) states that the project must “Meet or exceed the most stringent applicable Universal Accessible requirements set by federal, provincial and municipal regulators.” *However, there are no details as to what are the criteria and how will they be applied.*

² ²New Campus Development, Hospital and Central Utility Plant, Environmental Effects Evaluation, November 2022, page 11.

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CHNA Position: *There is nothing in the documentation that explains specifically how these high levels of accessibility will be achieved. There is an absence of even the most basic information regarding mobility accommodations, e.g. estimated/planned travel distance from standard and disability parking to the front entrance. There is also no mention of how seniors, persons with disabilities and families using strollers are to move safely around TOH campus that is vast nor how our harsh winters will affect mobility and how they will be mitigated. There is no mention of a lighting design to provide safe passage in the evenings, nor any details on security measures. For example, provide phones located across the whole of TOH property, security patrols, effective lighting throughout the property, security cameras, etc., similar to the lighting and security set up you would find on University and College campuses. Finally, there is still no mention of how the elevated walkway from the parking garage to the main building will be accommodated for persons with disabilities, senior etc (e.g. moving sidewalks).*

Site Plan Control and FLUDA/ Design Drawings

According to the Planning Rationale, the Central Utility Plant (CUP) will contain electrical, heating and cooling equipment which will provide services to the Hospital and other phases on the site. The CUP is sunken into the landscape below the grade of Maple Drive. Landscaped buffers a minimum 7.5 meters in width will be included between the CUP and the adjacent property line with the Central Experimental Farm. The Site Plan Control and FLUDA/Design Drawings are useful for illustrative purposes only and do not adequately portray the changes required at a detailed level that will have an impact on the landscape and surrounding heritage buildings. For example, there is only one illustration of the view of the Utility Plant plant from Maple Lane which is taken at a distance and during the summer only. It does not not show how the Plant will be sunken into the landscape below grade. It also does not adequately show how Maple Lane will be used for ambulances.

CHNA Position: *A 3-D model of Phases 3 and 4 is strongly recommended and should be presented to the City Planning and Housing Committee and to the TOH Community Advisory Council. The model should show what the buildings and surrounding area will look like in both winter (without trees in leaf) as well as summer and clearly identify all streets including Maple Lane. The model should also clearly indicate the traffic patterns for access to the plant, the main building and the parking lot.*

The community should be invited to a formal presentation of the 3D model.

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Site Plan Control Application Summary

The document states that “Phase 3 and 4 will also consists of landscape improvements to enhance accesses to the Hospital and will complete the construction of separated pedestrian and cycling facilities through the site on the east side of internal Roads A and B. It will also complete a multi-use pathway on the south side of the Main Entrance and a sidewalk on the north side to provide access to the Main Entrance. **The relocation of existing services located within the site and offsite intersection improvements will be necessary to enable these phases.**”

CHNA Position: *Details on what services are that are to be relocated and where they will be moved need to be provided.*

Cultural and Heritage

General Comments

The NCC performance criteria states that the proponent must: “*Reinforce the role (symbolic, cultural and scientific), public understanding, use and operations of the surrounding heritage sites – Central Experimental Farm, Dominion Observatory, Dominion Arboretum, Canada Agriculture and Food Museum, Prince of Wales Dr. (Capital scenic entry route) and the Rideau Canal*”.

According to City of Ottawa planning process, the Cultural Heritage Impacts Statement (CHIS) requires specific approval by the city. The document is 186 pages long and is now accompanied by an addendum of 87 pages. It follows the city template for CHIS: identification of buildings and landscapes potentially affected by the project, assessment of impacts, proposals of mitigation measures and recommendations. The TOH CHIS recommends approval of the project despite the inclusion of some inadequate mitigation measures.

One weakness of the CHIS is the **subjective judgement** of the consultants who use words like “minor,” “infrequent” and “negligible” to assess the impacts. Furthermore, in several places, the consultants weigh heritage impacts against the social benefit of the hospital and come to the seemingly arbitrary conclusion that the latter outweighs the former. Among the impacts identified by the consultants are alterations to the CEF National Historic Site (NHS), shadowing, views from the Rideau Canal NHS, access route for ambulances bringing

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vehicles close to the Heritage Azimuth building and land disturbances during construction. The consultants **failed to identify other important impacts** such as impacts to Views and Road E.

Dominion Observatory

The TOH plan calls for an entrance for emergency vehicles coming south from Carling Ave to turn left at the junction of Maple Drive and Winding Lane. This access will pass close to the Dominion Observatory campus, a heritage group that is composed of three Classified Federal Heritage Buildings (Observatory, South Azimuth and Photo Equatorial) and a number of Recognized Federal Heritage Buildings. The Cultural Heritage Impact Statement (CHIS) addendum #2 (Nov.10, 2022) is almost identical to the earlier CHIS. It identifies the following impacts:

Maple Drive is the primary access to the Dominion Observatory Campus and the proposed ambulance route will travel directly past the South Azimuth that is within 2 m of the curb. While the speed limit along Maple Drive is 30km/h, the short distance from the road, as well as the gradual curve in the road puts the South Azimuth Building at risk of emergency vehicles losing control in wet or icy conditions. The effect of traffic vibrations on a building can be exacerbated when vehicles contact irregularities on the road surface (e.g. Potholes, cracks and uneven manhole covers). **Without mitigation, the risk of emergency vehicles losing control and colliding with the buildings as well as the increased use of de-icing salt, represents a risk of major impact** (emphasis added).

The following inadequate mitigation measures are proposed in the CHIS addendum #2:

- Install non-visually intrusive bollards on the northwest, west and southwest side of the South Azimuth Building to remove the risk of collision by emergency vehicles.
- Work with Agriculture and Agri-food Canada (AAFC) to develop a de-icing plan for Maple Drive that is appropriate for heritage masonry buildings

CHNA Position: *To reduce traffic, Maple Drive should be restricted to incoming emergency vehicles only, with a controlled access gate installed on hospital land. Outbound emergency vehicles should use Prince of Wales and Preston to exit the site.*

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The plan should include appropriate chemicals that pose the least risk to historic masonry while achieving the de-icing objectives. It should include a precondition assessment of the South Azimuth building's masonry, periodic monitoring of the condition of these building's masonry and strategies for actions to take in the case of impacts as a result of salt damage.

Furthermore, the CHIS addendum identifies important impacts to views of the night sky from the observatory caused by outdoor lighting at the hospital. The night sky would essentially no longer be viewable from the observatory except in a northerly direction. The CHIS concludes that this is acceptable because there are currently no plans to re-install a telescope in the observatory. However, this is a self-fulfilling prophecy as the hospital lighting will permanently exclude the possibility of reinstalling a telescope in this historic observatory and restoring it to its original functional use.

The Dominion Observatory campus is projected to return a museum/educational use and should have more space around it to enable safe and educational visitor experience.

Given the heritage significance of the Dominion Observatory campus, CHNA recommends a reconfiguration of the Carling to Maple Drive/Winding Lane junction to better protect the Dominion Observatory campus and provide appropriate access to the heritage campus, as well as a robust landscape plan that softens the road edges and buffers the entrance to the TOH with trees and other greenery.

The buffers on the east side of Maple Drive are not sufficient. The line of trees planned to act as a buffer on the northwest, west, and southwest edges of the site is too thin to be effective, and should be widened."

Road E and Buildings #59 and #60

A new emergency vehicle access point is a proposed road exiting west from Prince of Wales Drive and entering directly onto the TOH site. Road E will pass close to two buildings, Nutrition Building (Building #59) and Heritage House residence (Building #60). In addition to being Recognized Federal Heritage Buildings, both are level 1 resources as part of the CEF National Historic Site designation. They contribute to the CEF cultural landscape that "reflects the 19th century philosophy of agriculture and carefully integrates an administrative core in a picturesque composition." The introduction of Road E effectively isolates these two building between Road E and the existing Driveway to the south.

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Further west, Road E passes close to another Recognized Federal Heritage Building (Saunders Building).

CHNA Position: *Reconsider the design to inset Road E from the property line and to buffer it from the NHS by a berm, trees and other landscape features to improve landscape setting for buildings #59 and #60 and the William Saunders Building.*

Construction impacts to buildings within 60 metres of the site

The CHIS addendum #2 raises the risk of major adverse impacts to heritage buildings adjacent to the site during construction. It states that “the adjacent Federal Heritage Buildings within 60 m of the west and south boundaries of the site may be subject to major adverse impacts as a result of construction from fugitive dust or construction vibration.”

The CHNA is very concerned by the potential for damage to heritage buildings of important community value, including the Tropical Greenhouse which is open to the public and frequently visited by many residents and visitors. This heritage building was recently restored at a great cost and requires special consideration.

The CHIS recommends the completion of a Heritage Protection Plan to mitigate construction related impacts. The Heritage Protection Plan would include:

- Completion of precondition surveys of all Federal Heritage Buildings adjacent to the Site
- Clearly mark on Project mapping the location of all adjacent Federal Heritage Buildings and communicate this to project personnel prior to mobilization.
- Creation of physical buffers – Erect temporary fencing or physical barriers at the work area boundaries to prevent accidental collision with the adjacent Federal Heritage Buildings and buildings protected in the CEF NHSC CIS.
- Manage fugitive dust emissions
- Monitor for vibration impact during adjacent construction and immediately stop work if vibration has exceeded the guideline limits specified.

CHNA Position: *The CHNA supports the requirement of a Heritage Protection Plan that would be completed in advance of and as a mandatory pre-condition of construction. It is unclear why the CHIS proposes to limit the range of the plan to buildings within 60m of the site given the potential for damage to other buildings*

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through the movement of heavy machinery and vibration. A precautionary approach should be taken to ensure the safety and integrity of all heritage buildings at the CEF, some of which may be more than 60m away from the site.

Views to and from the William Saunders Building

The Saunders Building is a key component of the surviving 19th-century landscape plan. The Commemorative Integrity Statement for the CEF NHS identifies the national significance of the central core that features science and administration buildings as well as a functional farm. To the north of the Driveway, the science and administration buildings are arranged around an expanse of lawn. Level 1 resources include the greenhouses, Heritage House and the Nutrition Building as well as the lawn and tree-lined roads and lanes. The CHIS acknowledges significant adverse impact on views north from the Driveway towards the Saunders Building.

CHNA Position: *In addition to the proposed set back and tree buffer of Road E, north of the Saunders Building, CHNA recommends that this area be further protected by a berm.*

Observatory House (Building #2) and Geophysical Laboratory (Building #3)

The CHIS identified an adverse shadowing impact on these two Recognized FHBs. The consultant judges that the impact is negligible, irreversible, and infrequent.

CHNA Position: *CHNA recommends measures to reduce the shadowing of the Observatory House (Building #2) and Geophysical Laboratory (Building #3).*

Environmental

CHNA Position: *The community will be following the implementation of environmental measures closely and would like to receive confirmation of all steps taken and be informed of the results for all monitoring, evaluations and planned actions in a timely, convenient and accessible manner.*

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1. Planning Rationale - D07-12-22-0168.PDF

- a. "TOH has committed to an overall 40% tree canopy coverage target over the NCD site over forty years supplemented by off-site planting where this cannot be achieved." (p.4)

CHNA Position: *We request further clarification of this statement. While we understand that it will take approximately 40 years for many of the planted trees to mature, we would like to know why 40% coverage could not be achieved, where any off-site planting would occur (hopefully as close to the site as possible) and why would this be necessary?*

- b. "Landscapes should be 75% native for woody planting (shrubs/trees) and 50% native for herbaceous material, vines and groundcover." (p.42)

CHNA Position: *These targets seem low – why couldn't it be 80% for each? If supply is an issue, there should be sufficient advance notice for local nurseries to start propagating adequate material.*

- c. "The growth and vigour of the tree canopy should be monitored and reviewed on an annual basis." and "The Vegetation Management/Conservation Strategy and Contractor Education Program has been updated to include specific recommendation to manage the long-term biodiversity of the wooded ridgeline." (p.42)

CHNA Position: *The long-term biodiversity of the entire site should be managed as part of the Vegetation Management and Conservation Strategies (not just the wooded ridgeline). **The management and conservation planning should have a sufficient scope and budget for remediation or restoration to address any deficiencies over the long term – not just during the site development and construction.***

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2. Environmental Effects Evaluation and EIA and TCR Update - D07-12-22-0168

a. P59-69, re: Vegetation management and tree conservation plans

CHNA Position: *Note above comments and questions about canopy cover and off-site plantings. We appreciate the efforts to retain more trees and reduce the overall number of trees that will need be cut down. It is reassuring to see the details of the vegetation and tree conservation, along with soil management plans for maximizing planting success. We would like to confirm who will be responsible for the long-term vegetation management and what the annual budget will be for on-going maintenance and remediation.*

b. P77, re: Indigenous Peoples Advisory Committee

CHNA Position: *The document indicates that a committee has been assembled – but who are the members (and which groups they represent) isn't clear. There is only a list of the groups that were invited to participate. **Could you share the names of the participants on that committee, what organizations or groups they represent, the Terms of Reference and the minutes of their meetings?***

c. Table 19 – Socio economic effects (p.79)

CHNA Position: *Loss of access to green space will have detrimental impacts to community well-being during the construction of the hospital and the interim required for seedlings and plantings to mature (40 years, as noted in the document). There are also significant impacts to the historical site of the Central Experimental Farm; the on-site experience of the historic and cultural aspects and views will be irreversible and adversely impacted.*

d. Potential Impacts and Mitigation (Table 21, pp 80-96)

CHNA Position: *These impacts and mitigation measures are well described and address many concerns raised. **Please confirm that the mitigation measures outlined here are indeed a plan, not just recommendations.***

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3. Phase 2 Environmental Site Assessment - D07-12-22-0168.PDF

The Proponent TOH, through the contractor Parsons and their hired company, present an environmental assessment with data from 2021 and added August 2022 data. This study was carried out by not by an independent expert, as required, but by a company chosen by the contractor and TOH. The data showed numerous 'exceedances' regarding contamination. An unbiased environmental assessment process is therefore needed and indispensable to restore any credibility of the environmental assessment process and any further conclusions.

It is concerning that, without further oversight or any checks and balances, this project currently has the right to destroy the Queen Juliana Park site and greenspace, and to remove contaminated soil without independent scientific evaluation at the cost of \$11.8 million billed to the federal government (the taxpayer). The City, the Proponent, provincial and federal authorities need to intervene in this deeply biased evaluation process. If the contractor's company acknowledges contamination, how much more would be shown by independent and science-based thorough evaluation, even when some of the superficial toxic grounds have already been removed? Why was the hasty assessment arranged, instead of waiting for the projected and approved assessment process above to unfold?

CHNA Position: *We would like to have the soil and groundwater retested by an independent contractor in 2023 following the on-site soil remediation done in 2022 after the initial tests. We would also like to see the results shared.*

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ANNEX A: NCC PROJECT SPECIFIC PERFORMANCE CRITERIA FOR THE NEW CIVIC DEVELOPMENT MASTER SITE PLAN³

- 1) Project Integration with its urban, natural and heritage context – the**
Proponent must demonstrate that the proposal integrates harmoniously with its setting – physically, visually, operationally and experientially throughout all development phases.

To meet this criterion the proposal must:

- i) Establish continuity and compatibility with each of the site's edge conditions in terms of scale, massing, density, height, land use, materiality, landscape, prominence and significance;
- ii) Promote the use of public transit and active mobility over private vehicles year-round;
- iii) Locate high density and transit-supportive uses in closest proximity to transit;
- iv) Create a recognizable institutional landmark on approaches without compromising the integrity of key view points identified by the NCC⁴, as well as public frontage at street level;
- v) Reinforce the role (symbolic, cultural and scientific), public understanding, use and operations of the surrounding heritage sites – Central Experimental Farm, Dominion Observatory, Dominion Arboretum, Canada Agriculture and Food Museum, Prince of Wales Dr. (Capital scenic entry route) and the Rideau Canal;
- vi) Create intuitive, engaging, safe and accessible site connectivity and permeability including:
 - a. To and from the main public entrance of the hospital
 - b. Across arterial roads that border the site to facilitate public access to adjacent sites;
 - c. Between points of interest and outdoor amenities on site (public entrances, areas of active recreation, green spaces, natural topography and view points); and
 - d. To points of interest and amenities of adjacent sites (transit, pathways, sidewalks, cycling lanes, Central Experimental Farm,

³ Email from Sean Moore, City of Ottawa to Alison Taylor, Board Member, CHNA

⁴ Key Viewpoints: All views identified in the Commemorative Integrity Statement for the Central Experimental Farm. Views sequence from Prince of Wales Scenic Entry, View from Queen Elizabeth Driveway (Capital Parkway entry at Preston St.). Adjacent CEF heritage buildings including toward the Dominion Observatory complex.

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- Dominion Arboretum, Dominion Observatory, Canada Agriculture and Food Museum).
- vii) Locate all operational infrastructure (parking structures, surface parking, loading docks, and utilities etc.) away from prominent areas on site to the maximum extent possible, limit their size and conceal them from view;
 - viii) Preserve the clarity of the natural topography;
 - ix) Maximize the preservation of non-invasive mature vegetation, with particular attention to distinctive trees along the escarpment;
 - x) Ensure harmonious coexistence of new land uses with the operation of adjacent uses (noise, vibration, site access, etc.) during and post construction.

Design Excellence and Innovation – The proponent must demonstrate that the proposal achieves or exceeds best practices for design, stakeholder engagement and inclusivity.

To meet this criterion, the Proposal must:

- i. Integrate all disciplines of design (planning architecture, landscape, engineering, industrial design and art) into one harmonious and innovative development;
- ii. Provide a design that is timeless and enduring, incorporating simplicity of form, durable and high quality materials, and elegant detailing and execution;
- iii. Create outdoor amenities for public use that capitalize on the varied natural topography and proposed landscape features to provide a range of experiences in and around the site;
- iv. Integrate microclimate responsive design strategies for all project components and phases;
- v. Implement Gender Based Analysis + strategies to provide equitable experience for all users;
- vi. Integrate indigenous perspectives in the design from all communities served;
- vii. Meet or exceed the most stringent applicable Universal Accessible requirements set by federal, provincial and municipal regulators;
- viii. Accommodate collaborative opportunities with the Central Experimental Farm (health and research) in the planning and design phases;
- ix. Include bilingualism in the design of site and building communication components.

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Sustainable Site Development – The proposal must demonstrate exemplary stewardship of environmental resources and sensitively minimize impact.

To meet this criterion, the Proposal must:

- i. Meet or exceed the most stringent applicable sustainable development requirements set by federal, provincial, and municipal regulators;
- ii. Identify, protect, and further support biodiversity (flora and fauna) in the proposal;
- iii. Retain lands designated for future development as permeable green space until such time when development will occur;
- iv. Integrate on-site stormwater management, treatment and infiltration in the site planning, landscape and architectural design (green roofs, bioretention swales, rainwater harvesting for irrigation, rain gardens, oil and grit separators);
- v. Specify low-maintenance native species well suited to site conditions that provide a balance of deciduous and coniferous species (biodiversity);
- vi. Implement and monitor Transportation Demand Management strategies to minimize on-site parking use and encourage a sustainable model split.