The Capitol Hill Community Association

1531 21 Avenue NW Calgary, AB T2M 1L9 Phone: 403.289.0859



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Circulation Control
Planning, Development & Assessment
P.O. Box 2100 Station M
Calgary AB T2P 2M5

Email: cpag.circ@calgary.ca

Attention: Peter Schryvers, File Manager Email: Peter.Schryvers@calgary.ca

Dear Peter,

RE: Request for Comment on LOC2019-0006 & DP2019-0487 (1309 & 1313 20 AV NW)

Capitol Hill Community Association (CHCA) is pleased to provide comment on the land use amendment application (LOC2019-0006) and development permit application (DP2019-0487) for 1309 & 1313 20 Avenue NW.

We apologize for the delayed response to this letter. We decided to hold off on a response until after we had a chance to meet with the applicant's representative.

Our response to the Land Use Change rationale letter prepared by CivicWorks dated Jan 14, 2019:

1. We find some of the comments misleading and trust Planning will investigate and consider other developer's perspectives relating to CivicWorks rationale, in particular to the statement that a six unit rowhouse type application on a 100' site is not considered to be viable.

This statement does not align with reality of current completed and proposed developments. We could provide many examples of rowhouse developments in our community that have unit width in the 15' and 16' range. Some examples:

- a. The 24 unit rowhouse development currently under construction at 1424-1440 23rd Avenue NW have a 15' unit width from centres of demising walls.
- b. The six unit rowhouse development recently completed at 1616-1618 24th Avenue NW have 16' unit width from centres of demising walls.
- c. We have seen many single family infills built on 25' lots which would result in widths of about 17'.
- d. Even townhome units in the suburbs such as the Walden development in south Calgary have 15'-16' widths from centres of demising walls.

It would seem that other developers completely disagree with the CivicWorks statement. We even discussed this item with another rowhouse developer in our neighbourhood, with a

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representative of Ward 7 present, who confirmed that six units on a 100' lot would be profitable in his opinion.

2. Further to the above comments, if this developer feels 16' widths are not adequate, they could always settle on five wider units rather then six narrower units. The developer would gain one extra unit over a typical semi-detached infill scenario, which must be a profitable business for developers given that we have hundreds of these types of developments.

Possibly for the good of the community and for the City's vision of introducing rowhousing down 20th Avenue, a <u>reasonable</u> profit scenario could be considered over an <u>absolute</u> profit scenario.

- 3. It is mentioned that this proposal could be a pilot project for an alternative development typology. This is not new. We currently have an eerily similar development at 1632 & 1634 20th Avenue NW which has sat vacant for the last two years as they have been unable to sell any units. That entire block has been ruined because of that development. We expect that RNDSQR would achieve a much higher quality project, but nonetheless, the massing and typology is similar. The market appears to be telling a different story than the CivicWorks rationale letter. Here are some other similar front-back development scenarios, many of which are several years old:
 - a. 458 20th Avenue NE
 - b. 1625 15th Avenue SW
 - c. 1640 14th Ave SW
 - d. 1949 36th Avenue SW
 - e. 1729 34th Avenue SW
 - f. 3511 14a Street SW
- 4. CHCA went through a long process with the City of Calgary to achieve a sensible increase in density and the R-CG designation was the outcome. We truly believe this typology will better serve our community and streets.

This applicant has the ability to create a new typology by doing rowhousing mid-block and be the pivotal starting point of a new idea catching on. Instead they are focused on a front-back scenario that has already been tried and appears to not be serving the community well. Front doors to units hidden in the back of developments is not new and is not great typology, in our opinion.

A mid-block rowhouse application would truly be a new typology for Calgary and provide a product for our neighborhood that has yet to be attempted. Reducing the 20th Avenue front setback from what is shown in the CivicWorks rationale letter would result in row houses with reasonable sized south facing backyards.

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- 5. We question if the applicant has tried to obtain an easement agreement with adjacent neighbours to allow building up to the property line. This would certainly result in wider units width and make a six unit rowhouse approach more feasible. It might be a long shot, but this scenario could benefit the neighbors in the future should they wish to develop rowhousing themselves.
- 6. It seems this application is more about maximizing profits over creating really great streets.
- 7. Some of our high level concerns regarding the design:
 - a. Lack of visibility to the rear housing doors from the public realm.
 - b. Lack of sunlight to the units along 20th Avenue, including their amenity spaces.
 - c. Massing and shadowing concerns of the adjacent neighbour's properties due to the excessively high building form at the rear of the site.
 - d. Increased traffic in the lane.
 - e. Increased parking demand on the streets.
 - f. Elevated decks on lane side overlooking many yards.
 - g. Lack of space in garages for cars and bins can lead to laneway congestion.
- 8. The CivicWorks letter indicated that a comprehensive community engagement process was undertaken. We would like to clarify that RNDSQR nor any representative of theirs contacted the Community Association <u>prior</u> to making the land use amendment application.

There was signage on the site with a web link to information and a portal to submit comments on the development, which presumably goes directly to the developer. Our primary concern with this approach is that many people don't understand the process of development and may assume that submitting comments directly to RNDSQR will equate to comments getting to the City Planners. The developer's signage is actually more overpowering than the City of Calgary's signage and could lead to some confusion. We hope this method was not intentional in controlling the comments that get to the Planner or the Community Association, but feel it certainly has the ability to do this.

We would also like to raise awareness of a concerning trend, not particularly related to this development but more in general, that we would like addressed by our COC representatives.

As this applicant mentions, we have been extremely supportive of higher density in our community and in the last 5 years there are roughly 75 new rowhouse units either completed or in progress in Capitol Hill. In addition to this, we have another three high density projects, either built or being developed which would account for approximately another 120 living units, and hundreds of new semi-detached dwellings.

Even though we have been quite supportive of density increases, we have yet to see the investment from COC back into areas such as making our streets more safe and liveable. As the density pressures

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increase, we are left with no new infrastructure. We need pedestrian lights, we need bike lanes and we need traffic calming. We have been patient, but our patience is running out.

We would like to see COC distribute some of the increased tax revenue from our community back into our community. Assuming roughly \$2,500 property tax per unit, we are talking about hundreds of thousands of dollars per year. Please provide some visible improvements so we can demonstrate to community members that density can equate to a better living environment.

Sincerely,

CC:

Cam Collingwood Director of Planning and Development Capitol Hill Community Association

> Druh Farrell, Ward 7 Councillor Craig Davies, City of Calgary Senior Planner & Project Lead, North Hill ARP update

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