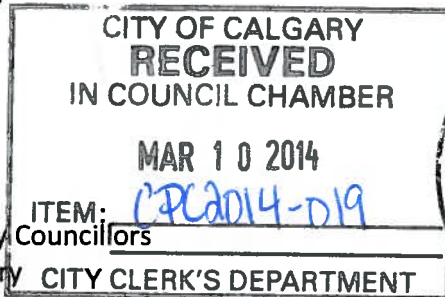




Richmond/Knob Hill Community Association



February 27, 2014

The Mayor & City Councilors

The City of Calgary

CITY CLERK'S DEPARTMENT

Re: Calgary Planning Commission Report to Council CPC2014-019 - Proposed Marda Loop Area Redevelopment Plan, Amendments to the Richmond ARP and South Calgary/Altadore ARP (Richmond, South Calgary and Altadore) Bylaws 3P2014, 4P2014 and 5P2014

Further to the Richmond/Knob Hill Community Association's (the "RKHCA's") previous submissions to City Administration regarding the captioned matter, this is to confirm that the RKHCA has reviewed the proposed Marda Loop Area Redevelopment Plan ("ARP") as forwarded to City Council by the Calgary Planning Commission (the "CPC"), including the amendments that were made by the CPC, and remains generally supportive of the proposed Marda Loop ARP but for the proposed maximum building height limits for the parcels along the north and south sides of 33rd Avenue SW. In this regard it should be noted that the portion of the Marda Loop business district that lies on the north side of 33rd Avenue SW and west of 20th Street SW falls within the boundaries of the Richmond/Knob Hill community. The remainder of the Marda Loop business district falls within the boundaries of the Marda Loop communities (formerly known as the communities of South Calgary, Altadore and Garrison Woods).

The RKHCA and the residents of the Richmond/Knob Hill community strongly favour the 33rd Avenue SW portion of the Marda Loop business district being developed into a vibrant "high street" shopping district that includes:

- 1) a mixture of interesting shops, restaurants and cafes at the street level;
- 2) a mixture of commercial office space and residential space on the upper floors, with:
 - a) the commercial space providing local services and employment opportunities, as well as contributing to the weekday vibrancy of the district; and
 - b) the residential space providing more affordable housing options and "eyes on the street", as well as contributing to the evening and weekend vibrancy of the district;
- 3) an appealing, pedestrian-friendly public realm that includes engaging storefronts, meeting places, street furniture, public trees and public art, and that draws people out of their cars, encourages them to linger and provides opportunities for social interaction;
- 4) a built form that both contributes to the pedestrian-friendly public realm and is respectful of the adjacent low-density residences to the north; and

- 5) public transit connectivity that provides fast and convenient car-free access between the district and other nearby activity centres, including downtown, the Beltline/17th Avenue SW shopping district, Mount Royal University, University of Calgary and the proposed Currie Barracks development, respecting the historic nature of Marda Loop as a Calgary Transit streetcar “end of line” loop.

As we look at examples of vibrant “high street” shopping districts located along other narrow (4 lanes, including parking lanes) east/west corridors in lower-density areas, such as the Kensington and Inglewood shopping districts in Calgary, the Main Street shopping district in Canmore, and the Queen Street West and Danforth shopping districts in Toronto, we find that the building heights along these “high streets” tend not to exceed 3-storeys. Even if we expand our scope to include examples of vibrant “high street” districts located along somewhat wider east/west corridors in medium-density areas, such as the Whyte Avenue shopping district in Edmonton (6 lanes, including parking lanes), we still find that the building heights tend not to exceed 3-storeys. Our understanding, based on our review of studies by such noted urban design experts as Copenhagen’s Jan Gehl, is that in northern cities buildings of 3-storeys or less contribute to the creation of pedestrian-friendly streetscapes, as they allow access to sunlight, block the wind (rather than accelerate it) and are perceived by pedestrians as being “human scale”.

In comparison, the proposed Marda Loop ARP currently provides for the height and built form of buildings on:

- 1) The north side of 33rd Avenue SW (the “North 33rd Ave Parcels”) to generally be limited to a maximum of 16m/4 storeys, with:
 - a) An ability to go up to 5 storeys on 2 corners if a public plaza is incorporated into the building footprint; and
 - b) A minimum 5m rear setback from the lane and a minimum 3m rear upper storey stepback;
- 2) The south side of 33rd Avenue SW (the “South 33rd Ave Parcels”) to generally be limited to a maximum of 16m/4 storeys, with an ability to go higher subject to a restriction that the sidewalk on the north side of 33rd Avenue SW not be shadowed for a minimum of 5 hours (presumably per day, although it does not specify that) during the period from March 21 to September 21 (the “Sidewalk Shadow Restriction”);
- 3) Both sides of 33rd Avenue SW to consider a front upper storey stepback or other architectural feature to reduce mass and shadowing impacts; and
- 4) The north side of 34th Avenue SW (the “North 34th Ave Parcels”) to generally be limited to a maximum of 16m/4 storeys, with an ability to go higher subject to the Sidewalk Shadow Restriction.

To begin with, it should be noted that, according to the feedback that City Administration received during the Open Houses that were held for the proposed Marda Loop ARP back in 2011, 80% of the respondents, most of whom were residents of the Marda Loop and Richmond/Knob Hill communities, felt that the proposed maximum building height limits were too high (although this result had to be

inferred from the feedback summary, which simply indicated that 10% of the respondents felt the proposed height limits should be higher and another 10% felt they were okay). It should also be noted that at that time the proposed height limits were not even as high as the currently proposed height limits, and that this community opposition to the proposed height limits was not even based on projected shadowing impacts, as no shadow study information was provided at the Open Houses. Shadow studies recently prepared by the RKHCA based on Google SketchUp models indicate that if the Marda Loop business district is built out to the maximum building height and built form limits currently provided for in the proposed Marda Loop ARP, then:

- 1) The main floor south-facing windows of the single family homes on low-density R-C2 parcels across the lane to the north of the North 33rd Ave Parcels, the vast majority of which are recently constructed 2-storey infills (the “32nd Ave Homes”), would be prevented from receiving any sunlight for around 2.5 MONTHS each year, from mid November to late January.
 - The RKHCA considers this amount of overshadowing of the 32nd Ave Homes to be excessive, and extremely unfair to the current owners of those homes, who purchased or constructed their homes on the understanding that the current 10/12/14m building height limits generally applicable to the North 33rd Ave Parcels would prevent any future redevelopment of those parcels from materially impacting their access to sunlight, even in the winter months when the sun is at its lowest.
- 2) Even with a 3m upper storey front setback on the buildings on the South 33rd Ave Parcels, the south-facing patios and windows of the retail shops, restaurants and cafes that occupy the ground level of street-front buildings on the North 33rd Ave Parcels (the “North 33rd Ave Businesses”) would be prevented from receiving any sunlight for around 5 MONTHS each year, from early October to early March.
 - The RKHCA also opposes this amount of overshadowing of the North 33rd Ave Businesses, as this lack of any sunlight for such a significant portion of the year, not just on the street, sidewalks and any patios, but even inside the North 33rd Ave Businesses, is contrary to the development of a vibrant and walkable “high street”, as it will make 33rd Avenue SW a dark, cold and uninviting place to be for much of the year, and will make it very difficult for the Marda Loop business district to maintain the year-round vibrancy that is needed for its businesses to thrive. As an example, on a recent sunny +10 degree Saturday afternoon in January we noted that the sunny south-facing patio of the Ship & Anchor pub on 17th Avenue SW was completely full with people socializing and enjoying the day, whereas not far away the south-facing patio of Fergus & Bix pub at 2018 33rd Avenue SW, which was fully shaded by the existing 23m/6-storey Treo (Shoppers Drug Mart) building across the street at 2033 33rd Avenue SW, did not have a single person on it. Anyone who attended the screenings of the films “The Social Life of Small Urban Spaces” by William Whyte and “Cities for People” by Jan Gehl at the recent “Baconfest” urban design film festival emceed by General Manager Rollin Stanley will understand that sun, or the lack of it, would have been a significant contributing factor to this result.

- The significant negative shadowing impact of the 23m/6 storey Treo building on Marda Loop's pedestrian environment is even apparent during Marda Loop's annual Marda Gras street festival in August. The sidewalk and roadway in front of the Treo building is always darker, cooler and windier than the rest of the closed-off portion of 33rd Avenue SW, and as a result is consistently less crowded with either people or kiosks.

Accordingly, to create a reasonable balance that will facilitate the redevelopment of the Marda Loop business district into a vibrant "high street" shopping district that is also respectful of the sunlight needs of both the 32nd Ave Homes and the North 33rd Ave Businesses, the RKHCA is requesting that the Marda Loop ARP be revised to provide for:

- 1) Both the North and South 33rd Ave Parcels to generally be subject to lower 3-storey building height limits, in the range of 12m to 14m; and
- 2) Building height limits of up to 23m/6 storeys for the North 34th Ave Parcels.

In this regard, the RKHCA shadow studies indicate that:

- 1) 12m tall buildings, with the same setbacks and upper floor stepbacks referred to above, on:
 - a) the North 33rd Ave Parcels would allow sunlight to reach the main floor south-facing windows of the 32nd Ave Homes throughout the year; and
 - b) the South 33rd Ave Parcels would only prevent sunlight from reaching the south-facing patios and windows of the North 33rd Ave Businesses for around 1.5 MONTHS each year, from late November to mid January;
- 2) 14m tall buildings, with the same setbacks and upper floor stepbacks referred to above, on:
 - a) the North 33rd Ave Parcels would only prevent sunlight from reaching the main floor south-facing windows of the 32nd Ave Homes for around 1.5 MONTHS each year, from late November to mid January; and
 - b) the South 33rd Ave Parcels would only prevent sunlight from reaching the south-facing patios and windows of the North 33rd Ave Businesses for around 2.5 MONTHS each year, from mid November to late January; and
- 3) 23m tall buildings on the North 34th Ave Parcels would allow for additional density to be incorporated into the Marda Loop business district without any adverse shadowing impact on either the 32nd Ave Homes or the North 33rd Ave Businesses, as the shadows cast by such buildings would only fall on the rear facades and rooftops of the 12m to 14m tall buildings on the South 33rd Ave Parcels. Such buildings would also create more reflected light for the north facades of the buildings on the multi-residential parcels along the south side of 34th Avenue SW (which probably should have been included within the ARP boundaries, and should be "upzoned" from their existing M-C1 land use designations to allow for higher density developments).

The RKHCA does not accept the suggestion that the North and South 33rd Ave Parcels will be undevelopable unless the maximum building height limits are increased to at least 16m/4 storeys, and that anything less than this height would be "uneconomic". The "Fergus & Bix" building at 2018 33rd Avenue SW was recently constructed as a 2-storey building with underground parking within the

existing 10m height limit. A current proposed development at 2040 33rd Avenue SW was originally promoted by the developer as being either a 3- or 4-storey building with underground parking. On nearby 17th Avenue SW, the "The Pint" building at 1428 17th Avenue SW was recently constructed as a 2.5 storey building, and a new 1-storey retail building is currently under construction on the NW corner of 17th Avenue and 4th Street SW. As long as City Administration is willing to continue to show flexibility regarding parking requirements, there should be no economic barrier to redevelopment of existing undeveloped or underdeveloped North or South 33rd Ave Parcels as 3-storey buildings.

The RKHCA has shared these concerns and copies of its Google SketchUp shadow study models with City Administration, the Marda Loop Business Revitalization Zone (BRZ), the Marda Loop Communities Association (MLCA), but to date our efforts to meet with these parties to discuss these concerns and the proposed solution outlined above have been unsuccessful. Copies of the shadow study models have also been provided to Ward 8 Councillor Evan Woolley and Ward 11 Councillor Brian Pincott, and we hope to have the models available for viewing at the March 10th City Council meeting.

If City Council feels inclined to approve the Marda Loop ARP without making the changes requested above, then the RKHCA would simply request that:

- 1) City Council approve the current wording of the building height and built form provisions of the Marda Loop ARP, inclusive of the CPC amendments, as at least the CPC amendments provide for the highest maximum building heights to be on the North 34th Ave Parcels, which in our view is where it makes the most sense; and
- 2) The North 33rd Ave Parcels be made subject to the same rear stepdown requirement that was provided for in similar circumstances in the 50th Avenue SW ARP that City Council approved just last year, being 16m stepping down to a maximum of 10m within 12m of the rear property line (see the eastmost block in Figure 16 on Page 28 of the 50th Avenue SW ARP). We see no reason why the owners and occupants of the 32nd Ave Homes should not, at a minimum, receive the same consideration as the owners and occupants of the single family homes on the south side of 49th Avenue SW in Elboya that will be across the lane from 16m/4 storey buildings on the north side of 50th Avenue SW.

Thank you.

Doug Roberts
Director & Chair, Development Committee
Richmond/Knob Hill Community Association
C/o 2126 28 Avenue SW
Calgary AB T2T 1K5