

Community Association Response



February 17, 2023

Development Circulation Controller
Planning & Development #8201
P.O. Box 2100 Station M
Calgary, AB T2P 2M5

Emailed to: dwayne.drobot@calgary.ca

RE: LOC2023-0005 | 321 10 St NW | C-COR1 to DC/MU-1

The Hillhurst Sunnyside Planning Committee (HSPC) would like to thank you for the opportunity to comment on the above application. We understand that the applicant/developer intends to re-designate the site from C-COR1 to DC/MU-1. The applicant indicated that the zoning would accommodate a mixed-use building at a height of 26 metres. We reviewed this application based on the Hillhurst-Sunnyside ARP and the Transit Oriented Development Policy. Our feedback within this letter includes what we heard from the Hillhurst Sunnyside Planning Committee and community members during the virtual presentation by the developer at the HSPC's meeting on February 2, 2023.

EXECUTIVE SUMMARY

Our detailed comments, including references to relevant ARP policy, are discussed in the sections following. High priority overall observations are listed here:

STRENGTHS

1. Increased density in close proximity to the Sunnyside C-Train Station
2. Filling in a large gap within the important corridor of 10 St NW
3. Indicated interest in providing affordable rental options

CHALLENGES

1. Significant deviation from statutory and guiding City policies
2. Insignificant public benefit
3. Laneway and traffic concerns

1. HEIGHT AND DENSITY

The HSPC is typically supportive of the continued progress towards the ARP vision of increased densification in the Hillhurst Sunnyside community. The applicant is requesting an increase from the existing FAR of 4.0, as outlined in the ARP, to an FAR of 5.0, which would accommodate an extra 6 meters of height. The HSPC would like to see the future development in this location conform to the existing parameters of the ARP as these parameters were set based on the context of the adjacent single-family homes to the west of the proposed development. The HSPC has been happy to support increased density in the community, however, these new developments must be sensitive to the existing surrounding context and thoughtful transitions must be utilized. The HSPC would also like to see more information regarding the intended setbacks and stepbacks of the proposed development.

2. LANEWAY & MOBILITY

The HSPC and community members would like to highlight concerns surrounding the adjacent laneway (Norfolk Lane), including the existing laneway study that was completed in 2014. To date, the issues outlined in this study have not been appropriately addressed or mitigated. Additionally, this laneway is narrow at 4.57 meters wide and currently supports both commercial and residential uses. Community members have noted ongoing damage to power poles and telephone lines caused by this influx of uses, as well as significant safety concerns regarding pedestrians and cyclists. The applicant has also indicated that parking access to this building will be via the laneway which will only contribute to the existing congestion and safety concerns. We are pleased with the applicant's commitment to reviewing the laneway concerns and look forward to see how this will impact their proposal. The ongoing issues surrounding the laneway must be addressed prior to the approval of any future developments.

With ongoing developments and applications being brought to the community, we ask that Council keep its promises to the community and commission the Mobility Assessment & Plan (MAP). Following the approval of the ARP to include density modifiers, there have been ten significant redevelopments in the TOD. The City has

failed to prepared a MAP as mandated by the ARP. The HSPC requests a MAP is completed prior approval of any development applications (land use amendment or development permit) that deviate from the current density modifiers. We understand that a Mobility Study is currently being completed as part of the Riley Communities LAP project and that a commitment to this study was additionally made as referenced in the Gladstone Rd approval (DP2022-06965). The HSPC additionally requests that a Transportation Impact Assessment (TIA) of both the laneway and adjacent streets, be completed prior to any land use amendment approval. This type of study is referenced in Section 4.2.3 of the ARP and should include transit, pedestrian, and bicycle service statements. The HSPC looks forward to the improvements that will address these concerns.

3. PUBLIC BENEFIT

The applicant has not been clear on what the potential public benefit for the community will include. The current density bonusing rate of \$19.77 per square meter to the Hillhurst/Sunnyside Community Amenity Fund (HSCAF) is insufficient to complete any meaningful public amenities improvements. In particular, the following improvement areas identified in the Hillhurst Sunnyside ARP and committed by The City as the TOD vision for Hillhurst/Sunnyside is realized, have not been addressed:

- 2 Avenue NW - The right of way along 2 Avenue NW between 10 Street NW and 9A Street NW was to be enhanced to reinforce the linkage between 10 Street NW and the Sunnyside.
- 3 Avenue NW - The pedestrian realm on 3 Avenue NW between 10A Street NW and the Sunnyside was to be improved to enhanced pedestrian and cycling connections, as well as improve conditions for transit users transferring between the bus and LRT.
- 14 Street NW - New circulation pattern with all-turns movement at 2 Avenue NW from both sides of 14 Street NW was to be implemented, requiring creation of a new east-west lane on the east side of 14 Street that will connect to the north-south lane. Creation of this lane could result in available space for creation of a pedestrian plaza.

Beyond the insufficient contributions the HSCAF, it is unclear if the City has established any additional development levies to fund these improvements. Section 4.1 of the ARP discusses the requirements of creating a high-quality TOD, which includes appropriate development on individual sites and in the public realm. Financing the public realm improvements requires a partnership between The City and private development interests. In achieving such a partnership, The City needs to:

- Be prepared to 'front end' the costs of key public realm improvements and undertake appropriate improvements to public infrastructure such as the revitalization of 10 Street NW;
- Establish clear expectations with respect to the responsibilities of individual developments for upgrading of adjacent public rights-of-way; and
- Establish an equitable method to enable all new development to contribute to public realm improvements that serve the entire TOD Area.

In addition to public realm benefits, there is also the opportunity for the applicant to provide non-market housing units in exchange for higher density. Hillhurst Sunnyside has experienced a loss of affordable housing through developments that cater to luxury or higher income units. The HSPC is pleased to hear that the developer is exploring a range of units and sizes to attract different levels of income, as well as exploring options through the CMHC. Section 4.3.7 of the ARP discusses the facilitation and delivery of affordable and non-market housing. Through this, the Approving Authority is encouraged to consider supporting relaxations to bylaw regulations where it is demonstrated that the relaxation is appropriate for the development and that the development is secured through an agreement to ensure long term affordability for low-income households. The HSPC would like to see a formal commitment made by the applicant/developer to ensure affordable units are included.

Please keep us informed as this important application progresses.

Thank you for the opportunity to comment,

Hillhurst Sunnyside Planning Committee
Hillhurst Sunnyside Community Association
cc: Executive, Hillhurst Sunnyside Planning Committee
Rachel Smigelski, Planning Specialist, HSCA
Ward 7 Councilor's Office



May 30, 2023

Development Circulation Controller
Planning & Development #8201
P.O. Box 2100 Station M
Calgary, AB T2P 2M5

Emailed to: dwayne.drobot@calgary.ca

RE: LOC2023-0005 | 321 10 St NW | C-COR1 to DC/MU-1

The Hillhurst Sunnyside Planning Committee (HSPC) would like to thank you for the opportunity to provide updated comments on the above-mentioned application. The comments below are in addition to what was noted in our February 17, 2023, submission. We ask that both letters be included in all review packages.

The applicant provided the HSPC with an update to the application on May 4, 2023, where they are seeking a greater relaxation to the maximum height allowance as well as an increase in the FAR for 321 10 ST NW. The HSPC understands that this application is requesting approval for a maximum height allowance of 31m and a FAR of 5.0. We have reviewed these amendments based on the Hillhurst-Sunnyside ARP and the Transit Oriented Development Policy. Our feedback within this letter includes what we heard from the Hillhurst Sunnyside Planning Committee and community members.

EXECUTIVE SUMMARY

Our detailed comments, including references to relevant ARP policy, are discussed in the sections following. The HSPC appreciates the desire to develop this site as it is located on a Neighbourhood Main Street and has been void of any development since Kensington Manor was demolished. We do have concerns regarding the deviation from the statutory ARP. High priority overall observations are listed here:

STRENGTHS

- Increased density in proximity of the Sunnyside C-Train Station.
- Filling in a large gap within the important corridor of 10 St NW.

CHALLENGES

- Laneway and traffic concerns.
- Deviation from statutory and guiding City policies.
- Insignificant public benefit.
- Uncertainty whether affordable housing options will be provided.



LANEWAY + MOBILITY

The HSPC comments from February 17, 2023, on laneway and mobility remain valid. We ask that administration and Calgary Planning Commission refer to that submission as well as what is noted below.

We have had an opportunity to review the Lane Mobility Assessment that was completed on Norfolk Lane shared between 10 ST NW and 10A ST NW. The report, developed by WATT Consulting Group, identified that the "minimum driving surface width is approximately 2.7m at the narrowest point along the corridor," (WATT Consulting Group, 2023). It has been observed that the narrow width of the lane causes challenges to the traffic flow, making it difficult for traffic to circumvent oncoming vehicles. The assessment concludes that the "proposed development is anticipated to have a negligible impact on the existing traffic conditions" (WATT Consulting, 2023). The HSPC does not support these findings.

The assessment does not take into consideration that the subject site has never had traffic access parking via the lane; it was previously accessed from 10 ST NW. Policy 3.2.2.20 does not support any automobile access from 10 ST NW; therefore, all parking is encouraged to be accessed via the lane. There is concern that this lane cannot support an additional 77 personal vehicles and added delivery vehicles.

Improvements are needed and the HSPC recommends that the parking requirements for the proposed development be limited or that city administration assess the entirety of Norfolk Lane and complete a Mobility Assessment & Plan to properly address these challenges.

HEIGHT + DENSITY

In our February submission, the HSPC denotes that we are typically supportive of the continued progress towards the ARP vision of increasing density within Hillhurst and Sunnyside. We recognize that this property is located on a Neighbourhood Main Street which aims to achieve increased densities and heights and has been sitting vacant for several years. The challenge that we have identified with this application is the impact the proposed FAR of 5.0 and a maximum height of 31m will have on the adjacent single-detached residents to the west. This new proposed height is now 11m which, far exceeds the recommended 20m maximum that is noted on Map 3.3 and Table 3.2 of the ARP. To fully understand the vision of this project, we request that the applicant provide the community with a rendering of what the design could resemble. We appreciate that this is not often part of the land use amendment phase of the planning process, however, we would like to have a better perspective as to what the setback and step backs would resemble.

The HSPC has received conflicting perspectives as to how the recommended increase in height came about and the rationale for this increase. There is concern that administration



may recommend approval for land use that reaches beyond what the policies in the statutory ARP are trying to achieve. We do appreciate the need to develop this site, add more housing, and increase densities, however, the limits should not greatly exceed what the ARP sets out to achieve.

The HSPC is disappointed that efforts are not being made by the City to recirculate affected properties of these changes prior to the public hearing. The applicant has assured us that they will notify surrounding properties of these changes and update the project website; however, the City should do their due diligence to ensure that the public is properly informed of these changes, well in advance of the public hearing.

PUBLIC BENEFIT

The HSPC comments from February 17, 2023, on public benefit remain valid. We ask that administration and Calgary Planning Commission refer to that submission.

AFFORDABLE HOUSING

The HSPC is uncertain as to whether affordable housing options will be available. The applicant was unable to provide information on this. As Calgary is in the midst of a housing crisis, it would be beneficial to provide housing that is affordable as this allows for a more diverse community to evolve in Hillhurst Sunnyside.

CONCLUDING REMARKS

The HSPC understands the significance of developing this property. We, like many other communities, enjoy having active streets. However, what we want is a streetscape that desires to achieve the goals, visions, and policies set forth in the Hillhurst Sunnyside ARP. We ask that city administration assess the merits of proposing a height that is more than 50% greater than the maximum building height identified for this particular site as well as assess the impact this building will have on Norfolk Lane.

Please keep us informed as this important application progresses.

Thank you for the opportunity to comment,

Hillhurst Sunnyside Planning Committee
Hillhurst Sunnyside Community Association

cc: Executive, Hillhurst Sunnyside Planning Committee
Kate Stenson, Executive Director, HSCA
Becky Poschmann, Community Planning Coordinator, HSCA
Ward 7 Councilor's Office