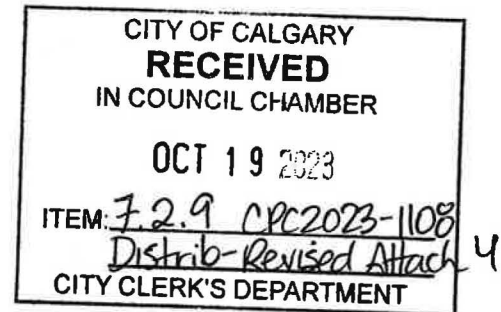


Community Association Response

First response received 2023 April 16

Circulation Control, Planning and Development
City of Calgary
Attn: Asia Walker, File Manager

RE: LOC2023-0054 202 – 224 40 Avenue NW



The application is for a land use change to H-GO covering six parcels along 40th Avenue NW. Of these six parcels, one is currently vacant land with an R-CG land use designation and the remainder are R-C2 with 1950's bungalows.

The concurrent Development Permit application (DP2023-01343) is for thirty-two rowhouse units with an additional thirty-two secondary suites, to be developed in two phases.

At this time Highland Park would like to register our objection to this project.

Density

Highland Park has been experiencing steady and significant densification over the last decade. The project as it has been proposed is designed to achieve the maximum allowed FAR of 1.50. It has been and is our contention that having FAR as the only limiter on density is insufficient. A project density of 196 uph is excessive for this small stretch of land in a community that is primarily R-C2 with some R-CG and M-CG.

We also have concerns that a project with this maximum allowed density (according to FAR) is contrary to best efforts to mitigate against future stormwater events. The concept of "sponge cities" argues for green space and trees to help reduce the impacts of flooding or heat island effects and enhance biodiversity through providing green space connectivity. With a density of 196 uph, the amount of green and permeable land on the site is reduced to the minimum allowed under H-GO

We seek clarity from the Planning Department if consideration of our neighborhood densification takes into account the densities of the approved land uses from the Highland Park golf course lands.

40th Avenue Corridor

We acknowledge that 40th Avenue is a Neighbourhood Flex area in the *North Hill Communities Local Area Plan*. We also recognize that this stretch of 40th Avenue is within TOD of the transit hub at Centre Street and 40 Avenue. Will this development proposal be measured against the principles of TOD? The avenue is a significant east-west arterial route. Highland Park has been experiencing densification over the past fifteen years with no civic improvements to our infrastructure. A substantial increase in population along 40th Avenue will necessitate improvements to the street and to pedestrian crossings.

We would like to see the City of Calgary budget and commit to improving cycling along 40 Avenue,

providing a connection between the Queen's Park Cemetery pathway and the Nose Creek pathway system? The Community Association would strongly advocate for a curb bulb and a pedestrian crossing signal be installed mid-block between Centre and 4th Streets to ensure the safety of pedestrians. Although we understand that improvements will be made to Centre Street to accommodate a BRT the Centre Street corridor cannot be evaluated and improvements made in a silo disconnected from the surrounding travel routes. Developments such as the one proposed under this land use demonstrate our increasing need to have infrastructure improvements that facilitate the east-west traffic flow along 40 Avenue while still ensuring the safety of non-vehicular users. This is particularly important inasmuch as both Buchanan Scholl and James Fowler High School are located south of 40 Avenue.

Green Space

The project being proposed for this site offers housing but only a minimum of outdoor amenity space. There is a lot two blocks to the north, but within the project where is the space for children to play or adults to enjoy fresh air and sunshine? The interior "courtyard" space is confined and will be shaded in except in summer, late spring and early fall. Highland Park has been deficient in green space for many years with less than 10% allocation. As densification continues and intensifies, the need for green space increases. Projects like the one proposed simply reduce the amount of green space that can be enjoyed by residents without any commitment by the developer to provide replacement amenities. In a greenfield development, communities are planned and developers are expected to contribute to parks, pathways, and other amenities. In the developed areas no such requirement is being made of developers. Densification is happening on a parcel-by-parcel basis with no obligation except to meet the requirements of the land use bylaw for that particular parcel. We suggest that the City require some space in these large residential projects be allocated for parkettes which would offer comfortable gathering places for the local residents

Filling in the courtyard space with thirty-two Schubert chokecherry trees in two lines is not a solution when most of the land is covered by buildings or concrete. Analysis of larger-scale projects, such as the one proposed for this site, must be judged by its compatibility and conformity to the City's climate change initiatives and to the policy statements in the NHCLAP regarding the importance of green space.

As usual, we continue to raise concerns about stormwater management, especially in regards to large projects that affect the amount of permeable land in the community. Highland Park is part of the Confederation Creek and Nose Creek drainage system, and the intersection of 40 Avenue and 4 Street NW has flooded several times in the past during large rainstorm events.

Public Engagement

When the *North Hill Communities Local Area Plan* was created, H-GO did not exist as a land use designation. The creators of the plan would have envisioned higher density along 40th Avenue as consisting of smaller apartment buildings, or a scattering of townhomes or four-plexes. The vision would have included the provision of additional amenities and services. For instance, a food market would be a very welcome addition to the community. The Community Association had previously signalled that a 4-unit rowhouse with suites would be acceptable at the corner of 1st Street and 40th Avenue NW. Likewise, there are two 4-unit rowhouses with suites approved for directly across the avenue.

It is disingenuous to not seek greater feedback from the broader community on an application of this scale and scope. We believe that simply providing pamphlets to nearby residents is insufficient with an application of this size and scope. Highland Park is a small community and adding 32 townhouses, with suites, represents a significant change to a major corridor. The Planning Committee of the Highland Park

Community Association recently met virtually with CivicWorks and the applicant. However, we recommended that CivicWorks consider hosting an open house to give community members additional opportunities to provide their input.

Built Form

It must be noted that rowhouses built to R-CG requirements have a maximum density cap of 75 uph. Four-plexes built under M-CG would have a density cap of 111 uph and could also have a more restrictive density modifier. We would welcome a variety of housing forms that offer choice of size and type to future residents and a project that offers visual interest – not just a wall of identical rowhouses with very few breaks in the blockface. The H-GO land use designation can allow for different forms, but there needs to be more stringent density controls and there should also be consideration given to the overall and cumulative impacts of projects of this size being proposed in the developed areas.

If you have any questions, please do not hesitate to contact us. Thank you.



Elise Bieche
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D. Jeanne Kimber
Development Director, Highland Park Community Association
Development@hpca.ca

cc: Misty Sklar, Manager of Development Planning – North

Second response received 2023 April 16

Circulation Control, Planning and Development
City of Calgary
Attn: Asia Walker, File Manager

RE: LOC2023-0054 204 – 212 40 Avenue NW

The above-mentioned application is for a land use change from R-CG and R-C2 to H-GO to enable Phase 1 of a large rowhouse development. Phase 1 will consist of three rowhouse buildings containing sixteen main units with basement flats. An amended Development Permit is expected to be filed shortly. The *North Hill Communities Local Area Plan* (NHCLAP) envisioned 40th Ave NW as a Neighbourhood Flex area with a Low Modified Building Scale of up to 4 storeys along this particular stretch of the avenue. As such, we acknowledge that H-GO is an appropriate land use designation for these parcels.

Regardless, there are issues arising from the expected increase in housing density. Our response to the original application raised concerns about pedestrian safety and vehicular traffic on 40th Ave NW. The response letter we received from CivicWorks indicated that the City did not feel that safety or traffic were likely to be a cause for concern. We disagree. The proposed development will bring a significant addition of residents on the north side of 40th Ave NW, which bisects Highland Park. Many future residents are likely to be children who will need to cross 40th Ave to get to Buchanan School. And yet, the city hasn't offered any plan to improve pedestrian connectivity. Why not?

For context, Highland Park continues to densify with many R-C2, R-CG, and H-GO land use applications. The NHCLAP envisions even greater density radiating out along 40th Ave and Centre St. This intersection is an important transit hub for Centre St. and Northern crosstown routes with or without the Green Line, and more BRT traffic is expected. Likewise, 40th Ave NW is a significant east-west crosstown artery for commuters travelling to/from the industrial northeast. Students attending James Fowler High School also contribute to both vehicular and pedestrian traffic. Increased vehicular traffic combined with an increased number of pedestrians requires improvements to the infrastructure to ensure pedestrian safety.

Unfortunately, the city has not matched its plan for a denser, more active, and a more walkable Highland Park with needed improvements in infrastructure. For example, an H-GO development at 35th Ave and 4th St NW will put twenty-two new dwelling units beside an uncontrolled crosswalk leading to Confederation Park. No improvements to this crosswalk are planned. This despite the scary situations that often arise when people try to cross 4th St at 36th Ave NW. It should also be noted that the proposed H-GO project is only one of several redevelopment projects along the same 3-block stretch of 40th Ave NW, albeit it is the largest. On the south side of 40th Ave are two approved rowhouse projects, one of which is under construction, as well as a new land use change application for H-GO at the corner of Centre B St and 40th Ave NW. Questions need to be asked regarding the cumulative impacts of these multiple projects on the city's and the community's infrastructure - whether it is the road system, sidewalks and pedestrian crossings, or storm and wastewater management.

The Community Association has undertaken significant building, landscape, and playground upgrades to the city-owned Community Hall, resulting in a family-friendly public space enjoyed by residents year-round. However, improvements to the dangerous intersection at 36th Ave and 1st St NW were made only after a dramatic vehicle collision despite previous complaints about traffic speeding through the playground zone or ignoring the stop signs. This intersection is immediately adjacent to the public space and playground at the Community Hall. Meanwhile, while we have below average rates of public green space, our primary recreation area, the Highland Valley, remains in legal limbo. We have been left in the dark for years about its future.

Rowhouse developments invariably incorporate small 1-bedroom basement suites. How many small 1-bedroom suites does a community or a city require? The footprint of a rowhouse unit is not large, especially if there are two buildings at the front and rear of a parcel. As a result, there is a dearth of larger suites that could accommodate two individuals who could share costs or that could provide housing for a small family. If affordability is a main theme of the Calgary Housing Strategy, then a proliferation of 1-bedroom suites does not necessarily offer housing at a reasonable price except to certain socio-economic or demographic markets.

The amended concept for the H-GO project envisions an improved courtyard space which will hopefully provide some safe space for young children to play and socialize. We will address specific concerns about the development through the DP process once the amended DP has been filed and is available for review. However, children attending Buchanan School will have to cross 40th Ave. Also as noted above, the Community Hall is located on 36th Ave and is a focus for community activities with a playground and an outside play area that is turned into a skating rink in winter. Again, this brings back into focus our concerns about pedestrian safety while crossing 40th Ave.

The Highland Park Community Association participates in discussion around these issues with reasoned and thoughtful feedback. But we must ask: When will the amount of change expected of our community be matched by reasonable investments in our community? What policies or plans are in place to ensure that a mix of housing sizes and types can be provided to satisfy the needs of a broad range of citizens? And equally important, what policies or procedures are in place to adequately address the cumulative impacts of ever increasing housing density?

If you have any questions, please do not hesitate to contact me at development@hpca.ca or on my cell at 403-390-7705.

Thank you.



D. Jeanne Kimber
Development Director,
On behalf of the Planning and Development Committee
Highland Park Community Association