

# Community Association Responses



November 30, 2023

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

Emailed to: [coleen.auld@calgary.ca](mailto:coleen.auld@calgary.ca)

**RE: LOC2022-0227| 201 10 St NW | DC to DC/MU-2h50f9.0**

The Hillhurst Sunnyside Planning Committee (HSPC) would like to thank you for the opportunity to provide further comment on the above-mentioned application following amendments that were made to the initial application. We understand that the amendment to the initial application has resulted in the base land use district used for the direct control district changing from C-COR-1 to MU-2.

The applicant has indicated that the proposed district will accommodate a mixed-use building at a height of 50 metres and a Floor Area Ratio ("FAR") of 9.0. We reviewed this application against the Part II of the Hillhurst Sunnyside Area Redevelopment Plan ("HS ARP") as well as the Municipal Development Plan ("MDP"). Our feedback within this letter is in addition to the comments the HSPC expressed in our February 16, 2023, submission. These comments have been developed from what we have heard from members of the HSPC as well as reviewing the applicants What We Heard Report and their June 30, 2023, submission.

## **EXECUTIVE SUMMARY**

Our detailed comments, including references to relevant ARP policy and supporting reports, are discussed in the sections following. High priority overall observations are listed here and those that are identified as challenges will be explained.

A summary outlining the challenges the HSPC has experienced with this application is provided on page 10.

## **STRENGTHS**

1. The proposed development aligns with policies of the MDP and the Calgary Climate Strategy
2. Improvements to a high-pedestrian, high traffic corner

1

## CHALLENGES

1. Height and Density
2. Policy compliance with the HS ARP
3. Laneway and mobility concerns
4. Community benefits
5. Reference to Local Area Plans
6. Engagement results

### 1. HEIGHT AND DENSITY

The height and density for this application continue to be a concern for the HSPC. The applicant alluded to a recent land use amendment that was approved in Hillhurst Sunnyside – JEMM: LOC2022-0086 (“JEMM”). The JEMM application is a DC based on MU-1 land use district with a maximum height of 50m and FAR 9.0. The major differences between the two applications are the JEMM project is located directly across from the Sunnyside LRT station does not have low-density residential in proximity to the site. The JEMM project site is supported by Transit Oriented Development (TOD) Policy 5.2, where the highest densities in a TOD station are should occur on sites *immediately adjacent* to the station. This application is not immediately adjacent to the LRT station and the HSPC does not believe these two applicants are contextual based on the surrounding land uses. During our discussions with Administration, the applicant, and Ward 7 office for the JEMM project, HSPC was told that this project would not set precedence in the community; therefore, JEMM should not be used as precedence when making decisions on this application.

### 2. POLICY COMPLIANCE WITH THE HS ARP

The applicant expressed that the proposed development aligns with the City policies including the MDP, HS ARP, and the Calgary Climate Strategy. As noted above, the HSPC agrees that this application does comply with policies outlined in the MDP and the Calgary Climate Strategy, however, to imply that the application complies with the policies of the HS ARP only to state that amendments are required, is contradictory.

Part II of the HS ARP, the current long range statutory plan for HSCA, was applied when reviewing the merits of this application. Part II was developed in concert with local community members and was adopted by council in 2009. The purpose of Part II provides guidance for developments that are located within the TOD area. Some key applicable policy sections are provided below for the purpose of highlighting the deviations of this application from policy.

#### **ARP 3.2.1 General Policies**

- New development should comply with the minimum and maximum building heights indicated in Table 3.2 and Map 3.3 based on conformance to the design policies and guidelines of Section 3.0 of the Plan.
- The maximum heights shown in Table 3.2 (or on Map 3.3) are not guaranteed entitlements. In order to achieve these maximums, projects will need to meet high standards of architectural and urban design quality that ensure projects make positive contributions to the public realm.

**TOD Policy 5.2 TOD Guideline – Minimize the impacts of density**

- The highest densities in a TOD station area should occur on sites immediately adjacent to the station. Consideration for impacts of height on shadowing and massing should be made in determining transitions as well. In addition, a minimum density may be established on parcels adjacent to the LRT station to ensure the desired intensity is achieved.
- Create transition between higher and lower intensity development by stepping down building heights and densities from the LRT station building.
- Ensure that building massing and shadowing impacts are minimized. Shadow studies may be required to ensure that new development does not create significant shadowing on existing communities.
- Create proper edge treatments such as compatible building scale, parking location, and landscaping between new development and existing communities to minimize impacts and ensure integration.

**TOD Policy 9.3 TOD Guideline – Built form should complement the local context**

- Each station exists in a particular community context. Development should complement the existing development and help to enhance the local character while creating a walkable, vibrant station area.
- Transitions between established residential areas and the new TOD area should provide a sensitive interface. Low rise, medium density residential or low-profile mixed-use development may be used as an appropriate transitional use between adjacent low density residential and the TOD area.

**ARP 2.2 Guiding Principles 2.2.1 Increase Housing**

- Sensitively increase residential development within the vicinity of the Sunnyside station and along the study area transportation corridors;
- Accommodate a wide variety of housing types and choices to meet residents' needs through various stages of life and economic situations;
- Create opportunities for affordable housing, especially for families with children.

**ARP 2.2.2 Respect Existing Community Character and Quality of Life**

- Locate higher density developments in low impact locations (e.g., where shadowing and traffic impacts are limited);

The HSPC is typically supportive of the continued progress towards the HS ARP vision of increased densification in the Hillhurst Sunnyside community. The HSPC is challenged with understanding how an application can apply for a FAR that is 4.0 greater than the recommended policies, as outlined on Map 3.2 of the HS ARP (Figure 1). We are further challenged with understanding how an application can apply for a maximum height that is 24m greater than the recommended height as outlined on Map 3.3 of the HS ARP (Figure 2).

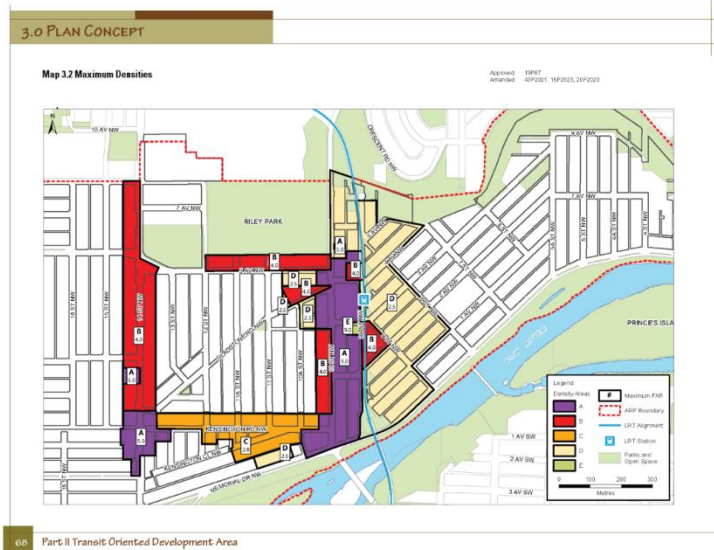


Figure 1: Map 3.2 Maximum Densities

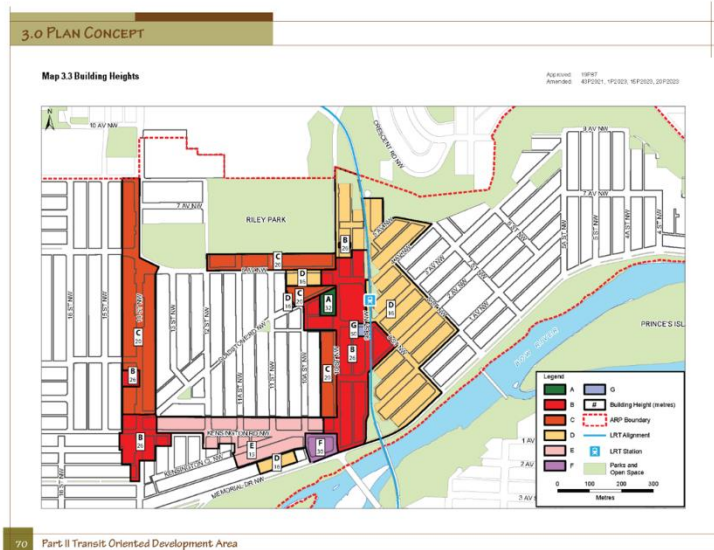


Figure 2: Map 3.3 Building Heights

### **3. LANEWAY & MOBILITY**

The proposed site is located at the corner of 10 ST NW and Kensington RD NW. Both roads are classified by the MDP as a neighbourhood main street (Map 1 Urban Structure) and an urban boulevard (Map 7 Road and Street Network). The MDP does not recognize this corner as an activity centre. The HSPC recognizes that this site and the proposed land use redesignation has several policies from the MDP that support its rationale.

In the What We Heard Report (“WWHR”) dated January 2023, the applicant acknowledges a key theme of concerns regarding the impact of traffic at a busy intersection and how access and egress will be addressed. They responded by mentioning a Traffic Impact Assessment (TIA) has been completed for the site and the team is working with transportation engineers in the City of Calgary to address any traffic concerns. The HSPC appreciates that a TIA has been completed, however, we have not been provided an opportunity to review this document. The HSPC believes it would be beneficial to be included in conversations with the team and transportation engineers at the City of Calgary to ensure that existing challenges related to this site and the adjacent laneway are effectively mitigated.

It is appreciated that the laneway is not often part of the land use redesignation process, however, the HSPC believes it is imperative to assess the current laneway and plan for the impacts that a building with a FAR of 9.0 can bring to this area. The laneway, as it is experienced today is extremely narrow and is difficult to navigate due to existing infrastructure and design (Figures 3 through 6). The location of the electrical power poles greatly decreases the width of the laneway for vehicles exiting onto 10<sup>th</sup> ST NW. The following images capture the existing challenges and include measurements to highlight how narrow certain locations are.

To circumvent these challenges, the HSPC recommends that Enmax consider relocating the power poles or relocating the utilities underground. It is appreciated that this is a significant cost and investment, however, if Hillhurst and Sunnyside continue to experience the current level of redevelopment on 10<sup>th</sup> ST NW and Kensington RD NW, it would benefit all parties by considering how to approach these utilities.



Figure 3: Rear Laneway looking west from 10 ST NW



Figure 4: Rear laneway looking west from 10th ST - barriers and challenges for vehicles to turn east from Norfolk Lane



Figure 5: Rear Lane and Norfolk Lane intersection



Figure 5: Rear Lane looking east from 10A ST access via Kensington Road

The HSPC would like the applicant and city administration to consider reducing the motor vehicle parking stalls that are required under the MU-2 land use district. Any reduction in vehicle parking stalls will support the Calgary Climate Strategy by encouraging mode shifts to low carbon transportation options such as walking, wheeling, and transit. Any reduction in motor vehicle

parking must be compensated by increasing the number of class 1 and class 2 bicycle parking stalls for residents and visitors by 40%.

#### **4. COMMUNITY BENEFITS**

It is appreciated that the applicant recognizes the importance of the corner of 10 ST NW and Kensington RD NW. The HSPC is supportive of a development that will introduce solutions to the challenges that community members experience daily when moving around this area, especially by increasing the pedestrian space and improving safety. We do not believe this space should be considered a public plaza; it should only support the pedestrian space.

The HSPC would like clarification from the applicant and the City of Calgary regarding the recognition of the plaza. In the June 30, 2023, submission, the applicant identifies the plaza as a publicly accessible private amenity area (plaza) when discussing the bonusing, whereas under community benefits, the space is identified as a large public plaza. Will it be a public space or private amenity space that is open to the public?

We are confused regarding the approach to funding the amenity space. Is the applicant asking that the area that is identified as "public plaza" be removed when calculating the bonus density contribution? Or are they looking to access funds from the Hillhurst Sunnyside Community Amenity Fund ("HSCAF") to develop the space? If it is the former, the HSPC does not support this. If it is the latter, as per the HSCAF Terms of Reference, the amenity fund cannot be used for public improvements on private land; this would be a cost the property owner will have to incur.

The HSPC has concerns on the amount of detail and attention that has been provided on the publicly accessible private amenity space at this phase of the planning process. While we appreciate the thought that is being placed into recognizing the need for improvements to the pedestrian realm at this important corner, we do have questions as to how this concept would be enforced at the development permit phase. The base land use district of MU-2 does not require a plaza be incorporated into the design and while the HS ARP does have policy that recommends improving the pedestrian space, we are concerned that this policy may not be enforced during the development permit phase.

To ensure the design concepts that have been presented during the land use amendment phase, the HSPC recommends that Direct Control bylaw include a rule that enforces the incorporation of the publicly accessible amenity space.

#### **5. REFERENCE TO LOCAL AREA PLANS**

In the applicant submissions, they discuss the recently approved Local Area Plans ("LAPs") in that they encourage densities and intensification of population and jobs beyond previously approved ARP policies throughout the city due to dated ARPs not reflecting current City goals. At the time of writing this letter, there have been two LAPs that have been adopted by Council. The third LAP is currently awaiting a decision from the regional board.

The MDP recognizes both Kensington RD NW and 10 ST NW as a Neighbourhood Main Street. For comparison, the MDP also recognizes 37<sup>th</sup> ST SW and 4<sup>th</sup> ST NW as Neighbourhood Main Streets, both of which are streets that are in the approved Westbrook LAP and North Hill LAP, respectively. We have reviewed both the LAPs and have noted the suggested building scale that



are deemed appropriate along a Neighbourhood Main Street (Table 1). Both documents identify a building scale of Low (up to 6 storeys) as being appropriate along streets which have similar characteristics as Kensington RD NW and 10<sup>th</sup> ST NW. For comparison purposes, the intersection of 37<sup>th</sup> ST SW and 17<sup>th</sup> AV SW have similar characteristics, however, the maximum allowable heights for a building located on the SW corner of this intersection is 12 storeys. It should be noted, this location has an established shopping centre, with a gas station, and multi-residential building. Also, both 17<sup>th</sup> AVE and 37<sup>th</sup> ST are five lanes, with wide sidewalks flanking both sides of the streets.

Table 1: Neighbourhood Main Streets and the building scales noted in Approved LAPs

Street	Local Area Plan	Building Scale/Height
4 <sup>th</sup> ST NW	North Hill	Low – up to 6 storeys
37 <sup>th</sup> ST SW	Westbrook	Low – up to 6 storeys
37 <sup>th</sup> ST SW & 17 <sup>th</sup> AVE intersection	Westbrook	NE – Mid – up to 12 storeys SE - Low – up to 6 storeys SW – Mid – up to 12 storeys (fronting 17 <sup>th</sup> and 37 <sup>th</sup> only) NW – Mid – up to 12 storeys (fronting 17 <sup>th</sup> s and 37 <sup>th</sup> only)

Any comparisons to the recently approved LAPs should be like for like; thus, all streets that are assigned by the MDP as Neighbourhood Main Street, should be compared. The proposed land use amendment is not comparable to the policies assigned to Neighbourhood Main Streets in the recently approved LAPs.

## 6. ENGAGEMENT

The City's Engage Policy defines engagement as:

*"Purposeful dialogue between The City and stakeholders to gather information to influence decision making."*

Further noted by The City, and information that is available through the [Community Outreach Toolkit webpage](#), engagement is about bringing interested or impacted people together to make better decisions. The HSPC understands that applicant-led engagement is at the discretion of the applicant, and The City cannot enforce applicants to complete community outreach; it is only strongly encouraged.

The HSPC appreciates the engagement that has been completed to date on this application. We would like to acknowledge that the applicant did present a "pre-application" at our October 6, 2022, planning committee meeting. The applicant did complete further engagement through pop-up events, an open house, and by hosting and maintaining a project website. The HSPC appreciates it when applicants choose to complete a thorough engagement program on complex applications, as it allows affected community members more opportunities to speak to the merits of the application.

The HSPC has reviewed the WWHR dated January 2023 as well as the applicant submissions. Through our interpretation, we have found the information presented to be contradictory. If the data from the WWHR is being used for decision-making, it needs to be re-analyzed. We feel there is a lack of clarity in the way the information is being presented in the main body of the report.

Our example below portrays our interpretation of the survey data that was collected in Question 5.

**Example of HSPC Interpretation of Survey Question #5**

Question 5 focuses on the overall height of a building on the subject site. The June 30, 2023, submission states that 48% of respondents supported 14 storeys or more for the subject site. Table 2 provides a breakdown of the results. The question was designed to allow participants to select one answer and new options were added following the first pop-up engagement event.

*Table 2: Question 5 Survey Results*

<b>Answer Choices</b>	<b>Responses (%)</b>	<b>Responses (#)</b>
Up to 26 storeys	12.61%	15/119
Up to 18 storeys	7.56%	9/119
Up to 14 storeys	27.73%	33/119
Up to 10 storeys	50.42%	60/119
Up to 8 storeys	1.68%	2/119
	= 100%	=119/119

These results show that 27.73% are in favour of a building that is up to 14 storeys, while 50.42% would support a building that is up to 10 storeys. In total nearly 80% of the respondents would prefer a building that is less than 14 storeys. Only 20.17% are in favour of a building that is greater than 14 storeys. Based on these results, it cannot be said that 48% of respondents support 14 storeys or more given the third option is worded for a building to be up to 14 storeys, not greater than 14 storeys.

The results do not include the data that was shared in the 'other' response. For the 'other' option, 55 respondents provided a response and 60% expressed their support towards a building that is up to 8 storeys.

Results from a survey provide quantifiable data, data that can be measured. Although the engagement that has been conducted is appreciated, it is believed the results that are included in any submission, presentation, or report should recognize the responses from all participants.

**SUMMARY OF CHALLENGES**

The file manager and the applicant did communicate with the HSPC that this application would be presented to the Calgary Planning Commission on December 7, 2023. We received notice on November 28 and 29. The summary below expands on the challenges that the HSPC has identified regarding rationale for recommendations.

The HSPC acknowledges that Part 1 of the HS ARP is outdated. We also recognize that portions of Part 2 may be outdated, as highlighted during recent Calgary Planning Commission meetings, however, the preface of this statutory plan states that the expected life of the HS ARP is ten to fifteen years. Seeing that part 2 was adopted in 2009, it remains current until 2024. The HSPC also acknowledges that the Riley LAP is currently being developed and remains in draft form, however, the building scale map has been made public and this site has a mid (12 storeys or less) building scale modifier assigned to it.

What we are challenged with, based on what this application is looking to achieve, is Administration's rationale for recommending approval for a height of 50m (up to 15 storeys) when the approved statutory plan supports 26 metres (up to 8 storeys) and the new plan is suggesting up to 12 storeys. If we cannot rely on the HS ARP to guide planning, because it is outdated, and the work on the Riley LAP is in draft form, why is the 50 metres (15 storeys being considered)? This causes us to question the level of collaboration within the City's Community Planning team and whether the Riley LAP is being developed separately from current active development applications.

The HSPC remains neutral on this application because we recognize the importance of re-imagining this very important corner of Kensington. We are aware that the Direct Control district that has been designed for this site will speak to articulation, transitions, and reduced shadowing, however, we do not know how these rules will need to be applied. We ask that decision makers to look beyond the site and appreciate how a development of this size will interact with what is currently in place and not slated to be upgraded. The additional 24m that is proposed will bring more pressure to a lane that is narrow and causes challenges to those who use it daily, along with creating new challenges for commercial and personal vehicles that would access the new buildings underground parking, especially if the development looks to achieve the minimum parking requirements. The land use phase of the planning process is important because it allows the public to disclose where challenges exist, project teams to plan how challenges can be mitigated, and whether new challenges will present themselves.

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



February 16, 2023

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

Emailed to: [coleen.auld@calgary.ca](mailto:coleen.auld@calgary.ca)

**RE: LOC2022-0227| 201 10 St NW | DC to DC/C-COR1**

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 DC to DC/C-COR1. The applicant indicated that the zoning would accommodate a mixed-use building at a height of 50 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 near employment centres and transit stations
2. Improvements to a high-pedestrian trafficked corner

#### **CHALLENGES**

1. Significant deviation from statutory and guiding City policies

2. Laneway and mobility concerns have not been addressed or mitigated
3. Insignificant public benefit

### **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. However, according to Section 3.2 of the Hillhurst Sunnyside ARP, opportunities to locate taller buildings within the community are limited to locations that will have minimal impact on existing residential areas. The subject site's close proximity to residential streets with little to no transition in height and density is unprecedented. Section 3.2 of the ARP also discusses that buildings that are 8 storeys or higher are expected to be designed as landmark features that provide reference to important destinations within the community, such as the Sunnyside C-Train Station or Riley Park. Although the subject site is within the TOD boundary, the location of this proposed development is not considered a landmark or gateway location and does not provide reference to an important destination within the community.

The applicant is proposing an increase from the existing FAR of 5.0, as included in the ARP, to an FAR of 9.0. The HSPC is strongly opposed to this deviation in consideration of the significant impacts this will have to the existing urban fabric of the community, in addition to the existing laneway and mobility concerns, as will be explored further in this letter. Additionally, the HSPC would like to highlight Administration's recommendation of refusal regarding an application on this site that occurred in 2015. The 2015 application would have allowed for an FAR of 7.0 and a maximum building height of 36 meters. Reasoning for this refusal included failure to meet the intent of the ARP and insufficient density bonusing/public benefit in regards to the plaza. These factors are still relevant with the current application, especially considering the 2.0 increase in FAR and 14 metre increase in height with the current application.

### **2. LANEWAY & MOBILITY**

The proposed site is cornered by both a major roadway (10 St NW) and a collector road (Kensington Rd). This highly trafficked corner, in addition to the intersection of Memorial Dr NW and 10 St NW, highlight significant concerns regarding traffic and mobility. At peak hours, community members living in this general vicinity attempting to exit or enter their community are met with a near stand-still. While this is expected as residents of a vibrant, inner-city community, the addition of a mixed-use development with an FAR of 9.0 and a maximum height of 50 meters at this corner is not realistic or feasible.

Additionally, the laneway adjacent to the proposed development is narrow at 4.57 meters wide and currently supporting both commercial and residential uses. Community members have noted ongoing damage to power poles, telephone lines, and fence damage to private properties caused by this influx of uses. The applicant has indicated that parking access to this building, as well as loading and building servicing, will be located via the laneway, yet the transportation study that they have provided does not address these laneway issues.

The HSPC would also like to highlight the significant safety concerns located at both the intersection of 10 St NW and Kensington Rd NW and crossing/exiting the laneway adjacent to the proposed development. The high volume of vehicle traffic entering and leaving the community, especially during peak hours, paired with the narrow sidewalk and limited visibility, does not provide for a safe experience for pedestrians or cyclists. The HSPC would like to see the possibility of a Pedestrian Scramble explored at this intersection that would prevent right-hand turns on red lights and would improve the pedestrian experience.

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 prepare a MAP as mandated by the ARP. The HSPC requests a MAP is completed prior to 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 public plaza offered by the applicant is insufficient in the exchanger for higher density at a level which is a significant deviation from the ARP. A public plaza at the northwest corner of 10 Street NW and Kensington Road NW was not identified as a key plaza in the Hillhurst Sunnyside ARP, but it was identified as a key pedestrian corner and a different treatment plan is proposed. Section 3.3.1 Item 6 of the ARP identifies the

southwest corner of 10 Street NW and Gladstone Road NW, as well as the south east corner of 10 Street NW and 2 Avenue NW, as key plaza locations. Item 9 of this section indicates the subject site as a key pedestrian corner that should be redesigned and expanded to include the following:

- Indented corner 'plaza' to provide increased pedestrian space
- Textured paving to establish the corner as pedestrian friendly space
- 'Full-length' lowered sidewalk curb encompassing both crosswalks to ensure universal accessibility and ease of movement between the sidewalk and the crosswalk.
- Relocation of traffic signal box to a less prominent location.

In addition, the CPC has previously described a plaza in this location as "disingenuous" with it likely being occupied and used primarily by restaurants located on the commercial ground floor, rather than as a "public plaza" as the applicant has described. This is in alignment with community concerns over actual use of the plaza and the applicant and City's failure to commit who will govern the plazas private vs. public uses.

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 to 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. There has been no agreement presented by the applicant to ensure long term affordability for low-income households. Section 3.1.1 of the ARP states that developers of large-scale projects are strongly encouraged to partner with non-profit agencies or The City of Calgary in order to provide non-market housing units within a market development. Additionally, 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. Presentations by the applicant have indicated that this development will result in a high-end condominium with little to no reference of how affordability will be achieved within the community. This, alongside the insufficient public benefiting as referenced above, depicts an unreasonable development that does not bring value to the existing community.

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