



November 18, 2008

Sustainable Community Planning
Land Use Planning & Policy
The City of Calgary
P.O. Box 2100, Stn M
Calgary, AB T2P 2M5

Sent via email

ATTN: Mr. Steve Jones, Ms. Deborah Cooper, Ms. Allison Chan

RE: Hillhurst-Sunnyside ARP Part 2 - TOD Area Draft

Dear Steve, Deborah and Allison,

The Community Environment Committee of the Hillhurst-Sunnyside Community Association has reviewed the draft TOD Area ARP Update and offers the following comments for your consideration.

Section 3.1 - Land Use & Density

It appears that live/work dwellings, according to Section 3.1, have been identified in error (based on previous discussion) in Mixed-Use policy areas, where the intent was for the dwellings to be identified only in Medium Density and Medium Density Mid-Rise policy areas. If live/work dwellings are to be allowed in the Mixed-Use policy areas then the built form should be such that at-grade activity is commercial in nature and residential uses should not be permitted at-grade. Also, the policy language should provide enhanced definition of the intent and built-form associated with live/work dwellings.

Section 3.2.1 - Built Form and Site Design, General Policies

The maximum height for Area A (St. John – Stucky Site) is proposed at 38 meters along 10th Street. Based on the third party development economics assessment completed by Jay Wollenberg, approximately 5.0 FAR and a 26 meter height would be a reasonable threshold to facilitate substantive high-quality redevelopment on larger development sites and also provide a reasonable return for the developer. The proposed height of 38 meters is in excess of this threshold. There has not been any reasonable rationale presented to justify this height. Feedback throughout the public consultation process has stressed heights as a prime concern.

Section 3.2.2 Mixed Use (Point 25, St. John - Stucky site)

We do not have issue with the site specific policy language developed to date, except for the previously mentioned height issue. We understand that there is more content being developed and we expect an opportunity to review this language upon completion.

Section 3.2.3 – Residential Areas (Mixed Density Mid-Rise Area, Point 17)

The policy language does not provide an adequate description of the intent or implementation strategy for laneway housing. There is strong support for secondary-suites throughout the community, which traditionally include basement or rear yard above-garage suites. However, the successful laneway development of building forms such as semi-detached dwellings and townhouses is not understood.

Section 3.3 – Urban Design and Public Realm

The principles of this section are strongly supported. Comprehensive improvement of the public realm will be fundamental to the revitalization and economic vibrancy of the community.

Section 4.1 – Financing the Public Realm

There are concerns that the guidelines do not provide an adequate level of detailed policy language to achieve improvements to the public realm.

The Community Environment Committee strongly suggests that all redevelopment trigger monetary contribution to physical public realm improvements, historical preservation, and/or provision of affordable housing. A concrete redevelopment levy policy is suggested, which greatly expands on the language included in Section 4.1.2.1 (Point 3). The formula for the redevelopment levy was discussed amongst the Committee. The following strategies were debated and should be considered:

- A levy on all redevelopment (X dollars per square meter of development).
- A flat rate levy on all development, plus a percentage charge based on square meters of development.
- A levy on the last 25% of the building envelope as pertains to height and/or FAR.
- A levy on any development built in excess of the existing ARP regulations.

We strongly encourage the development of a detailed strategy and/or methodology, prior to the preparation of a final draft. We support the list of key public realm improvement areas, which have been identified during the public consultation process, but the list should not be considered exclusive, where a redevelopment levy strategy should be considered a means by which the community's public realm can be improved and maintained in perpetuity.

Section 4.1.2 - Development Funded Improvements

This section should be amended to prioritize the completion of a comprehensive public realm urban design strategy for larger portions of the TOD area, as opposed to piece-meal site-specific public realm improvement designs triggered by proximate redevelopment activity. A comprehensive strategy will provide for thoughtful consideration of a greater public realm, which is well connected, integrated, and thematic.

General Comments

The triangle parcel (bounded by 10th Street, Gladstone Road, and 4th Avenue) containing the historic church should not be included in Area B, especially given that the formal density bouncing policy language (i.e., density transfer policy) is no longer part of the existing draft. The site should be included in Area H.

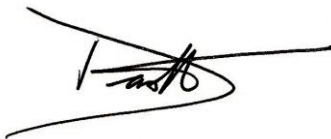
It is our vision that Hillhurst-Sunnyside be a leading community of environmental sustainability. We support the inclusion of policy language that encourages developers to build with environmental stewardship as a cornerstone.

Blanket Land-Use Redesignation was discussed as a possibility at the last Citizen Advisory Committee meeting. We believe that this should not be encouraged given that it may result in the potential loss of opportunity to review redevelopment proposals on a case by case basis to ensure high-quality design and reasonable community impact and benefit.

In closing, the above is a summary of the most important concerns we have with the draft document. There may be other concerns that may come to light as we continue to review the document and receive content updates. Communications from the City regarding updates to the contents on an ongoing basis are greatly appreciated. Our expectation is that the membership of the Community Advisory Committee will be provided with a proposed final draft prior to the November 26th Open House.

Sincerely,

Community Environment Committee
Hillhurst-Sunnyside Community Association

A handwritten signature in black ink, appearing to read 'D. White', with a large, sweeping flourish underneath.

David White, Chairman

Cc: Druh Farrell, Alderman Ward 7
Gary Andrishak, IBI Group