

COMMENTS ON THE PROPOSED DEVELOPMENT AT 4730 DUCHESS STREET

I do not believe that the proposed stacked townhouse development at 4730 Duchess Street should be approved or should be granted an increase of FSR to 1.2.

[Citations below are to the *Norquay Village Neighbourhood Centre Plan Implementation Report* adopted by Council after the public hearing of April 9, 2013. *Appendix B* to this report is the RM-7 and RM-7N District Schedule (Stacked Townhouse and Rowhouse) and *Appendix J* is the RM-7 and RM-7N Guidelines.]

“If the Director of Planning first considers the intent of this schedule and all applicable Council policies and guidelines, and the submissions of any advisory groups, property owners or tenants, the Director of Planning may permit an increase in floor space ratio.” [Appendix B 4.7.2] The operative word is “may.” I contend that this application meets neither the intent of the district schedule nor many of the guidelines.

1. This application does not meet the intent of RM-7 zoning.

The intent of this new zone is clearly stated: “To encourage the development of ground-oriented, medium-density multiple dwellings in the form of rowhouses and stacked townhouses, the majority of which are suitably sized for families (i.e. three-bedroom units)... while retaining the basic physical character of the neighbourhood.” [(Appendix J 1.1)]

In no way does this development “retain the basic physical character of the neighbourhood.” There is no significant amount of usable outside ground level open space on the site. Staircases take up far too much of the front yard. As currently proposed, most of the 22 ft. front yard setback is used for sidewalks and staircases. There is very little back yard, and infrastructure such as parking spaces, bicycle storage lockers, and garbage/recycling containers cover most of the area. [See Appendix to these comments for a more detailed description of the problems of exterior staircases and rear yard infrastructure.]

2. This application fails to meet specific guidelines for the stacked townhouse zone.

(a) *Size of units.* The size of a typical unit is given as 1,200 sq. ft. [Report, p.11]. All of the units proposed for this site are smaller than 1200 sq. ft. The livable area of the two ground level end units is further reduced by the inclusion of lock-off suites.

(b) *Width of living spaces.* “The minimum width of major living spaces (e.g. living room) of any dwelling unit should not be less than 4.2 m (14 ft.)” [Appendix J 2.2.2(b)(iv)] The living room in these units is less than 14 feet wide. The small entry

way between the front door and the stairs is not to be included as part of the living space.

(c) Access to natural light. “Daylight for interior and exterior spaces for all housing types should be maximized.” [Appendix J 2.6.] The bedrooms in the basements of the end ground level units have very small windows.

(d) Storage. “The internal design of stacked townhouses should consider the storage needs of families. In-suite storage areas should be provided within individual dwelling units or within storage areas located in underground parking structures.” [Appendix J 2.12] Aside from bedroom closets and kitchen cupboards, there is no in-suite storage. The area most likely to be appropriated for additional storage is the area under the front yard exterior staircases.

The application submitted for this site, at least the parts of it that appear on the website, can only be described as “sketchy.” As the first proposal for the new RM-7 zoning in Norquay (indeed in the city), it will set precedents for what is and what is not allowed for this new housing type. Development Services needs to give careful consideration to these concerns.

Jeanette Jones
February 10, 2014

APPENDIX

PROBLEMS OF EXTERIOR STAIRCASES AND REAR YARD INFRASTRUCTURE IN THE RT-11 AND RM-7 ZONES

Development Services needs to consider the problems created by exterior staircases for stacked townhouses in the RM-7 zone. Another significant problem is the amount of space taken up by infrastructure (garages/parking spaces, bicycle storage lockers and garbage/recycling containers) in the rear yards in both the RT-11 and the RM-7 zones.

I. EXTERIOR STAIRCASES IN STACKED TOWNHOUSES IN THE RM-7 ZONE

Zoning regulations permit external staircases in stacked townhouses, but do not specify what form they should take or where they should be located.

1. Single run staircases to upper storeys should not be permitted. The upper level units have only one entrance and there is only one stairway to that entrance. I object to exterior staircases that have no turns or landings, but run in a straight line almost to the front lot line.

(a) They are unsafe. If someone slips, they can easily fall down the entire staircase, which will consist of at least 15 steps. Seniors and families with babies are unlikely to own these units, but they will undoubtedly visit. Landings are called landings because people who fall will land on them!

(b) They will seriously impact the views from the ground level units.

(c) If grass is planted under the staircases as seems to be indicated on the site plan for 4730 Duchess, it likely will not grow well because the location is too shady. If it does grow, it will be very difficult to mow.

(d) Given the minimal amount of storage likely to exist in stacked townhouses (see comments for 4730 Duchess above) and the absence of garages, the space under the staircases is likely to be used for “informal” storage. This will result in the development becoming an eyesore in the neighbourhood rather than a model for future development.

I do not think that an interior single run staircase of this length would be permitted. Exterior single run staircases are permitted in the rear of single family dwellings, but of course in that case they are not the only entrance.

Exterior staircases should have at least one landing. A staircase with a 180 degree turn at each of two landings would be safer, take up less space in the front yard, and be a less inviting storage space.

2. Exterior staircases should be limited to locations at the side of the site, near the lot line. Placing staircases in the centre of the site has more impact on views and seriously limits usable open space in the front yard.

II. REAR YARD INFRASTRUCTURE IN THE RT-11 AND RM-7 ZONES

Parking spaces (1 per unit), bicycle storage lockers (2.25 per unit), and garbage/recycling containers (2 per unit) seem to take up most of the open space in the rear yard of developments proposed for this zoning. The parking spaces are a given, but ways need to be found to reduce the area covered by bicycle storage lockers and garbage/recycling containers.

1. Bicycle storage lockers. The guidelines state that “creative bike parking solutions should be sought, such as under stairs and patios, in crawl spaces and in freestanding boxes.” *[Appendix J 4.9.2]* A freestanding row of boxes across the rear of the lot is the most undesirable alternative. It should be possible to relocate and/or stack bike lockers.

2. Garbage/recycling containers. The guidelines for RM-7 state that “for stacked townhouse developments with five or more units, not including lock-off units, appropriate areas for group garbage and recycling bins directly off the lane should be provided. The size of these areas should be approximately 1.2 m (4 ft.) by 2.4 m (3 ft.) for garbage containers and 2.4 m (8 ft.) by 0.9 m (3 ft.) for recycling containers.” *[Appendix J 9 (a)]*

Individual garbage and yard waste bins for each unit take up an unacceptable amount of space. It would be very difficult to ensure the required three feet of separation between containers when they are set out on garbage collection day.

The duplex/small house development at 2899 E. 41st is proposing 8 units on a site where the dead-end lane cannot be used for garbage pick-up. On collection day, 16 bins would be set out along Killarney Street immediately north of 41st Avenue. This is a scenario both dysfunctional (in terms of traffic flow) and unsightly. Small houses on shared lots should also have shared garbage/recycling containers, especially where the alternative is setting the containers out on the street for collection.

Taken together, the proposed exterior staircases and the amount of rear yard infrastructure reduce available open space to an unacceptable degree. It will be very difficult for many development proposals to conform to the intent of the zoning regulations for RT-11 and RM-7 until these problems are addressed.

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