

March 18, 2021

Jyde Heaven
Planning Development and Assessment
City of Calgary
Jyde.Heaven@calgary.ca

Dear Jyde Heaven:

RE: LOC2021 - 0017

The Richmond Knob Hill Development Committee (“RKHDC”) has reviewed the above noted land use amendment application requesting a change from MU-2f3.0h16 to MU-2f4h22, which proposes a change from a maximum height/FAR of 16 meters/3 to maximum height/FAR of 22 meters/4.

To begin, I would like to highlight the fact that the Richmond Knob Hill Community is very progressive when it comes to development:

- The RKHDC supports the Marda Loop Main Streets Program and the resulting 33rd and 34th Avenues SW Marda Loop Streetscapes Master Plan / Amended Marda Loop Area Redevelopment Plan.
- The RKHDC supports the redevelopment / revitalization of Marda Loop.
- The RKHDC always works together with developers to ensure that our community continues to evolve and flourish in line with the City’s densification/growth/housing diversification policy (Municipal Development Plan) while maintaining the qualities of a great community.
- The RKHDC always maintains a positive relationship with developers and we are not against any sort of specific housing type, whether it be single family, duplex, infills, rowhomes, basement suites, townhomes or apartments.

The objective of the RKHDC is to ensure that each new development in our community helps our goal of maintaining and growing a great community.

We support the applicants desire to redevelop the property in question because it is currently being underutilized. The resulting increase in residents and commercial space will help local businesses and provide residents with more walkable retail options.

Although we support the redevelopment of this site, we do not support the land use amendment submitted by the applicant. The RKHDC noted the following issues:

Richmond Knob Hill Community Association, 2433 26 Ave SW, Calgary, AB T2T 5Y5
(403) 249-8385, info@richmondknobhill.ca

Main Streets - Land Use Bylaws / FAR

During the development of the Marda Loop Main Streets Master Plan, which was finalized and passed by council in 2019, less than 2 years ago, a complete analysis was done of the area, which included a detailed analysis of feedback from stakeholders, review of the existing policy, land use districts and parking requirements. It also looked at current and future market demand and growth forecasts, infrastructure capacity within the Main Street areas and costs to redevelop streets and sidewalks that align with the Calgary Transportation Plan (CTP) and the Complete Streets Guide. Based on this analysis City Administration determined the best land use bylaws for each property / block in the area. At that time administration recommended the approval of the land use bylaws because, “they responded to the Council direction to action the Main Streets Implementation Plan, provide additional direction and **certainty for area residents, landowners and applicants** and allow for and enable an appropriate scale of development and intensity within the context of Marda Loop”. (This is directly from the Urban Strategy Report to Calgary Planning Commission 2019 April 04).

Since significant analysis was done to determine the appropriate land use bylaws for each property/block in Marda Loop and one of the main reasons for adopting them was to provide certainty for area residents, landowners, and applicants – it doesn’t make any sense to allow changes to property zoning so soon after it was designated. The only situation in which it may be appropriate would be if there had been significant changes in numerous factors that best determined land use bylaw for particular property and that is not the case in this situation.

Main Streets - Erosion of Trust with Citizens

During the development of the Main Streets initiative a significant number of citizens were involved. A total of 800 people attended engagement events in February, May and September 2018. In addition, approximately 350 pieces of feedback from in person and online opportunities were received. (Data from Urban Strategy Report to Calgary Planning Commission 2019 April 04 – Final Engagement Summary Report). This does not include time community associations spent on the initiative. After investing considerable time/energy on the initiative only to have important parts changed within 2 years will upset people and any trust they have with City Administration will be lost. The City will have a very difficult time trying to work with citizens in this community in the future if a initiative that was suppose to provide certainty is changed in a short period of time.

Traffic

The Applicant has provided a transportation impact assessment that determined that the development would not have a significant impact on the surrounding transportation network. But, after a review of the details there have been errors identified in the underlying data which determined their findings. Specifically, the number of units in the area, the Lyfe building, were not accurately represented. As result the findings cannot be relied on.

The RKHDC frequently gets complaints about traffic in the area and the City is doing a traffic calming pilot at 21st St and 33rd Ave SW. Therefore, any additional units will compound the recognized existing traffic problem.

As there is disagreement with regards to the traffic impact as a result of the proposed development – perception by the community vs the Applicants traffic impact assessment, I request a proper comprehensive traffic impact assessment be undertaken by the City. The study should include adjacent communities and determine the traffic impact if theoretically all the Main Streets 33rd/34th was redeveloped to the current zoning in the Marda Loop MDP. Doing this assessment is important as It is very short sighted not to not consider traffic generated from future development.

Parking

The applicant is calculating the number of parking spots required for the 6 Story (22 Meter / FAR 4) building they want to build using the bylaw permitting a 25% reduction for proximity to frequent bus service. Based on their own measurements – as outlined in their TIA Section 6.1 – The site is outside the standard distance to frequent bus service identified in the bylaw (150m bylaw vs. 180m to Route #7 and 300m to MAX Yellow). Based on their own admission they don't meet the requirement and without the 25% reduction they don't have enough parking spots to support a 6 Story (22 Meter / FAR 4) building.

In addition, the Marda Loop ARP 4.1.3 requires that a reduction of parking requirements will only be considered with the submission of a parking study. The City did a parking assessment for Marda Loop as a part of the Main Streets Project, and it was determined at that time there were some blocks that were over utilized and there was an overall perception of limited parking. They are assuming that if they do a parking study it will not determine there are parking issues, even though when one was done for Main streets issues were identified.

With the current number of parking spots the Applicant is including in their development – without a relaxation of the parking spot bylaw and hoping there are no issue that results from a parking study – they will not have enough spots to support a 6 Story (22 Meter / FAR 4) building.

Neighbors

The Property owners to the North of the site will be impacted too adversely if the increase in height is allowed. The properties on the North side are a maximum of 10 meters and the applicant is asking to develop a building at a height 22 meters – this will result in a severe lack of privacy and shadowing issues. The applicant has provided a shadowing analysis which is an estimate based on the interpretation of the proposed architectural design. In the analysis provided there is significant impact to some neighbors during certain times of the year, but, the shadowing analysis cannot be relied upon because we do not know what the actual architectural design will be as they haven't submitted it. Therefore the shadowing impact to neighbors could be more of an issue than represented in their report.

Thank you for taking our analysis into consideration. If you have any further questions feel free to contact me.

Regards,

A handwritten signature in black ink, appearing to be 'GS', with a long horizontal flourish extending to the right.

Gary Sarohia
Director of Development
Richmond Knob Hill Community Association

cc: Councillor Evan Wooley
Development Advisor Ward 8
Member of the RKHCA Executive Committee