

# Community Association Response

File Number: LOC2021-0080  
Response Date: August 2022

The West Hillhurst Community Association Planning Committee (“WHPC”) **opposes** the proposed Land Use Amendment (LOC2021-0080).

The WHPC is of the view that the Land Use Amendment application, LOC2021-0080, for the property located at 526-530 19 Street NW be evaluated as part of the Riley Communities LAP process, or at a minimum go through a similar level of public engagement, feedback, and collaboration it would have received if the Riley Communities planning process were complete.

We are not calling for a halt to (re)development, only a temporary halt to land use amendments until the current LAP process is completed. Landowners do not have a right to land use amendment, only a right to a reasonable use of their property, which they have under the current land use zoning. Given the property’s location along 6 Ave and 19 St NW in proximity to numerous development-related applications in progress, it is imperative that this application be evaluated in the context of the larger streetscape to ensure a cohesive public realm and appropriate development which respects the challenges and limitations of this unique portion of 19 St. It is the request of the WHPC that, as part of the Riley Communities LAP process and individual application review, special consideration be given to future 19 St land use amendments and in particular, the properties north of 2 Ave along the east side of 19 St which have unique constraints compared to the rest of the street.

The outcome of this application has the potential to significantly negate the usefulness and purpose of the Riley Communities LAP, as one of the key objectives of the LAP was to formulate a comprehensive vision for 19 St pursuant to a motion approved by Council on July 22, 2019. In line with that motion, densification along 19 St would be best achieved when undertaken as part of a larger development strategy agreed upon by stakeholders through a thoughtfully considered, broadly participatory, feedback and assessment-based process.

The WHPC is supportive of developments which are seen to have broad community support by way of them contributing positively to the community’s public realm. Unfortunately, we see neither direct nor indirect public realm benefits from the proposal. Furthermore, the WHPC has received community opposition to this application.

Additional reasons for the WHPC’s opposition to the proposed land use amendment from RC-2 to M-CG are as follows:

- The subject property is located in a very unique area of the community (owing to its heritage as the site of Calgary’s post-war Victory Homes) with specific constraints which are not conducive to substantive densification or intensification.
- The homes in this block on the east side of 19 St from 2 Ave north to 6 Ave do not have a rear laneway, thus limiting vehicle access.
- This lack of laneway presents a major challenge to accommodate the number of vehicles which would accompany a development of the proposed scale, in addition to accommodating the requisite service / industrial vehicles which would be needed at the site (e.g. garbage, recycling, delivery trucks, etc.).

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- An up-zoning for residential and commercial use at this site is likely to require deliveries and parking that would necessitate driveways running over the sidewalks and increase vehicular traffic. This increases danger for pedestrians and cyclists at an area near a busy community centre and an elementary/high school. It also creates sloping curb cuts that are more dangerous for pedestrians especially in the winter. This corner needs to be considered in the context of an entire development and traffic safety plan.
- The increase to vehicular traffic generated by the proposed development would cross the pedestrian and cycle path realm on 6 Ave and 19 St, posing a substantial increase in hazards to pedestrians and cyclists. This is in direct violation of multiple City policies that place pedestrians and cyclists at the top of the mobility hierarchy.
- The WHPC is also concerned with the proximity of this parcel to the intersection of 19<sup>th</sup> Street and 6<sup>th</sup> Avenue NW and more specifically, how the parcel will be accessed safely considering the positioning of the intersection and sight lines for vehicular traffic, pedestrians and cyclists.
- The lots in this Victory Home area are narrower and shorter than the standard 50' x 120' lot, which exacerbates the impacts on privacy and shadowing which would result from height increases, massing, and expanded lot coverage on adjacent properties. Given the reduced lot sizes, changes to the existing setbacks in this area have a much more drastic impact as the homes are in closer proximity than usual and do not benefit from the buffer that a rear laneway would provide. Without a concurrent Development Permit, it is unclear to the WHPC how the developer plans to mitigate these issues.
- The WHPC is of the view that prospective up-zoning of parcels, or lengthy delays between re-zoning applications and actual development, is detrimental to good planning outcomes within the community.
- The WHPC has significant concern that the scope of the proposed development, for which a development permit application has not yet been submitted, may easily prove uneconomic, thereby requiring the actual development permit application to be materially different than what has been suggested as part of this land use redesignation application, requiring amendments to the currently proposed zoning modifiers in addition to future by-law relaxations.
- In order for stakeholders to be in the best possible position to evaluate the merits of this application, the WHPC encourages the applicant to submit a development permit application so the land use redesignation and DP can be evaluated on a concurrent basis.

In conclusion, the WHPC reiterates its opposition to the proposed Land Use Amendment. Given the unique characteristics of the east side of 19 St from 2 Ave to 6 Ave, we strongly recommend any zoning changes to this stretch of 19 St be guided by a well-considered and coherent plan for the area that recognizes and resolves its significant challenges.

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Given the property’s location along 6 Ave and 19 St NW in proximity to numerous development-related applications in progress, it is imperative that this application be evaluated in the context of the larger streetscape to ensure a cohesive public realm and appropriately-suited development which respects the challenges and limitations of this unique portion of 19 St. It is the request of the WHPC that, as part of the Riley Communities LAP process and individual application review, special consideration be given to future 19 St land use amendments and in particular, the properties north of 2 Ave along the east side of 19 St which have unique constraints compared to the rest of the street.

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Additional reasons for the WHPC’s opposition to the proposed land use amendment from RC-2 to MU-1f2.0h11 are as follows:

- The subject property is located in a very unique area of the community (owing to its heritage as the site of Calgary’s post-war Victory Homes) with specific constraints which are not conducive to substantive densification or intensification.
- The homes in this block on the east side of 19 St from 2 Ave north to 6 Ave do not have a rear laneway, thus limiting vehicle access.
- This lack of laneway presents a major challenge to accommodate the number of vehicles which would accompany a development of the proposed scale, in addition to accommodating the requisite service / industrial vehicles which would be needed at the site (e.g. garbage, recycling, delivery trucks, etc.).
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elementary/high school. It also creates sloping curb cuts that are more dangerous for pedestrians especially in the winter. This corner needs to be considered in the context of an entire development and traffic safety plan.

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