



Development Review Committee

800 34th Ave S.W.
Calgary, AB, T2S 0X4

Date: February 1, 2022

Development Circulation Controller
Planning, Development & Assessment #8201
PO Box 2100 Station M
Calgary, AB, T2P 2M5
Email: DP.Circ@calgary.ca

Attn: Derek Pomreinke, derek.pomreinke@calgary.ca; Joseph Yun, joseph.yun@calgary.ca

Re: Calgary Planning Commission LOC2021-0072 (3719 14th Street S.W.)

Application Details:

File Number: LOC2021-0072
DP2021-3256

File Manager: Derek Pomreinke Phone: (403)587-3094 Email: Derek.Pomreinke@calgary.ca

Address: 3719 14 Street SW

Land Use Bylaw: 1P2007 L.U.D.: R-C2
Community: Altadore

Description: New: Rowhouse (1 building), Semi-detached Dwelling (1 building) Secondary Suite (2 buildings, 5 units), Accessory Residential Building (garage)

THE ELBOW PARK RESIDENTS ASSOCIATION, AS REPRESENTATIVE OF THE COMMUNITY, OPPOSES THIS APPLICATION.

On January 19, 2022, the Elbow Park Residents Association co-presented with Marda Loop Community Association at a public engagement session hosted by Civic Works pertaining to 4 development applications in Altadore. Over 125 people were in attendance including community residents, representatives for the applicant and representatives from the City of Calgary Planning Department. There were many questions and comments from attendees. The top 10 themes for EPRA were:

1. Lack of meaningful public engagement:

- There was no attempt, or even any interest, to incorporate community feedback or to consider the quality of life concerns of surrounding neighbours.
- Despite widespread opposition for the proposed application, we were “informed” DURING the January 19, 2022, engagement session that the applicant was proceeding with the application in its present state.

2. Inappropriate use of District Control (DC) zoning designation:

- This application is NOT innovative, and the “site constraint” is the existing bylaw.
- DC zoning should not be used to circumvent the current zoning requirements. Representatives for the applicant argued that this zoning change is justified because the Land Use Bylaw is under review, but current bylaw IP2007 is still the legal instrument in effect and any changes to the LUB must undergo a public hearing.

3. Lack of Demand/Supply data to warrant the drastic density change from one unit to ten units:

- There are currently many vacant units of similar size and scale on the market.
- The proposed development is “predatory” and takes advantage of a desirable central location that would more suited to semi-detached housing.
- There is high market demand for families with young children seeking single & semi-detached dwellings. The property is zoned R-C2 which currently allows a 400% increase in density, exceeding the stated density goals of the MDP.
- There are a series of appropriately-zoned lots for sale at 2224 & 2230 34th Avenue that are close to transit, within a reasonable walking distance to grocery stores and other services. This location is more suitable for high-density development. (see photo below)



4. Misrepresents Middle Housing:

- The proposed project is a poor example of Missing Middle Housing.
- The primary objective of Missing Middle Housing is delivery of thoughtful form and scale with minimal visual impact to a community.
- “House scale” is an important aspect of MMH, it’s not just about getting as many units as possible on a lot.
- Dan Parolek, who coined the term “Missing Middle Housing”, advises developers against being “bad neighbours” and warns that the market will deliver bad form and scale if it’s allowed. He cautions cities to be thoughtful and careful about what they’re regulating.
- Dan Parolek also urges careful consideration of the impact of a third floor as they are not suitable for every project.

5. Lack of appropriate transition from single-detached homes to higher density as per the stated goals of MDP:

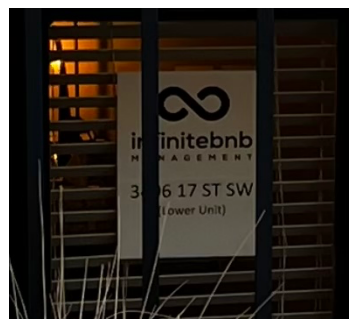
- Maintaining compatibility, avoiding dramatic contrast in height and scale with low density residential areas through limits on allowable heights and bulk of new development
- Massing new development to frame adjacent streets in a way that respects the existing scale of the street
- Limiting the impacts of shadowing on neighbouring streets, parks and properties.
- Ensuring appropriate transition to adjacent development

6. Insufficient Parking and lack of walkability

- There is insufficient parking provided on-site and a lack of on-street parking in front of the subject site. There is no way for the city to guarantee that the occupants of the micro suites will not have parking needs. This will likely result in people parking on the already maxed-out neighbouring streets.
- Transit options are limited and the subject site is not located within a reasonable walking distance to amenities such as grocery stores and laundromats.

7. Dubious claims of addressing shortage of affordable housing:

- Other existing units of similar size in the community are either vacant or used as short-term rentals such as 3406 17 Street SW (see photo below).
- Overpayment for micro rental accommodation does not respect or empower renters
- A reduction in the supply of single-family homes in established communities, will increase the value of the remaining homes, making it more difficult for the average Calgarian to buy them.



8. Lack of respect for the quality of life of existing adjacent residents:

- Undermining “certainty of use” is extremely stressful
- The density change is aggressive and uncomfortable
- The profit margin of the developer is insufficient justification for the undue, negative impact on surrounding residents and the destabilization of the community of Altadore

9. Waste Management:

- There is insufficient space to realistically manage the number of bins required for 10 units

10. Flooding:

- Underground streams cause annual flooding in homes along 36th Avenue. No assessment has been done to ensure that the proposed development will not exacerbate the problem.

In conclusion, there is insufficient data to support density of the scale of proposed development. Furthermore, MLCA, ERPA and adjacent neighbours vigorously oppose this application. EPRA agrees that an increase in density is appropriate for location and would support an application for semi-detached housing with secondary suites, a 400% density increase and a more suitable of application of the desired “Missing Middle” housing.

Due to the aforementioned issues, Elbow Park Residents Association respectfully requests that the Calgary Planning Commission declines approval of the proposed application.

Sincerely,

Martina Walsh
EPRA Development Director