

October 24th, 2022

Office of the City Clerk
The City of Calgary
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Application for Land Use Amendment: 3003 26 St SW

You have invited comments for the subject Application for Land Use Redesignation. I have reviewed the Application and tender my strongest objections to this ad-hoc, spot redesignation of a current R-C2 parcel to R-CG land use. My review considers:

- The Application
- Municipal Development Plan (MDP)
- The Guide for Local Area Planning (LAP)
- Development Map <https://developmentmap.calgary.ca/> (DM)
- Killarney/ Glengarry Area Development Plan – May 2017 (KGADP)
- Killarney/ Glengarry Area Redevelopment Plan (KGARP)
<https://www.calgary.ca/content/dam/www/engage/documents/killarney-arp/kgarp-whatweheard-final.pdf>
- Westbrook Communities Local Area Planning Project <https://engage.calgary.ca/Westbrook> (WCLAPP)
- The City of Calgary Land Use Bylaw 1P2007 (July 28, 2021)
- Building Consistency in Calgary Communities

Macro Planning

The Application wholly overrides the strength and attractiveness of the present low density residential community. Current residents have made decisions to enter and sustain living in this part of the community because of the physical, environmental and financial security the location represents for owners. Against this background, the Application has substantial negative impacts:

- It is likely that proposed build form will be a 4-unit rowhouse, potentially with secondary suites. As you are well aware, this form does not conform to prior development plans and application thereof i.e. low density, single family detached, duplex infill housing of no more than 2 units. The KGADP sets out in unambiguous terms that it is important to maintain this low-density policy and further states 'Low Density single and two-family dwelling policy for development will continue to be applied to the areas presently designated R-2'. If the Application is likely to lead to medium density, 4-unit – and there is every indication that it will - then it should be rejected without further consideration.
- Similarly, the current DM designates the subject parcel central to an extensive area of R-C2/ DC (designated R-2) thereby reinforcing the application of the KGADP. There should be no revision

to such designations unless under a full review of the Area Development Plan. To permit spot rezoning communicates to residents - close and far - that the City does not abide by its own planning policies, regulations and processes.

- Should the City wish to impose such incongruous developments within established areas then the proper route is through a consultative process to develop a plan agreed with the residents. Indeed, through such processes (KGARP/ WCLAPP), albeit ones that stalled due to COVID-19, the City has already been informed by residents:
 - “No spot rezoning”; “Keep zoned RC-1 only”; “One off redevelopment outside the vision of the community needs to stop”; “...ensure that redevelopment is planned and appropriate...”; “We need to maintain sufficient distance between and around housing structures”; “Too many rentals (safety concerns). Absentee landlords”; “afraid the city will promote redevelopment and densification at the detriment to existing neighbourhoods and residents”; “It's a quiet neighbourhood, and I worry that development and density will leak from the main corridors into the quiet streets”
 - To ignore such feedback would not only lead to a development that is wholly at odds with the character and style of the adjacent neighbourhood, it will also undermine trust and only discourage others from engaging with the City.
- The LAP sets out that ‘Building forms that contain three or more residential units should be supported in the following areas’:
 - Within transit station areas.
 - The subject property is not within a transit station area.
 - Near or adjacent to an identified Main Street or Activity centre.
 - The subject property is not near or adjacent to an identified Main Street or Activity centre.
 - On higher activity streets
 - The subject property is not on a higher activity street.
 - Where the parcel has a lane and parking can be accommodated on site
 - The parcel does have a lane but the Application will likely make provision for 4 vehicles in garages and 2 shared visitor stalls. In reality, the development will, with the most likely probability, add 12 to 16 vehicles in an already congested parking scape. Furthermore, many residents use garages for storage rather than parking so that 4 of these vehicles will be off-street is highly unlikely.
- Previous redesignation applications in the surrounding area have sought to use R-CG to transition from R-C2 to M-CG. The build forms surrounding the Application have, however, entirely different characteristics from such examples. In plain terms, there is no transition to M-CG to accommodate. Thus, the development will not only sit out of character and style to the surrounding buildings but it also provides zero *urban transition* properties whatsoever.
- Given the lack of adherence by City authorities to the City’s own planning policies, regulations and processes, and the associated ad-hoc redesignation of land-use, then it is of very high probability that parcels adjacent or close to the subject property will also be re-zoned. I previously objected another redesignation under LOC2021-0146 and specifically highlighted that there was significant potential that 2838 26 St SW, 3003 26 St SW and 3002 26A St SW would turnover from single detached dwellings to R-CG in the coming years. That is now evidently coming to fruition through the subject application. Such developments will entirely change the

character of the whole area. More specifically, as the owner of 2702 28 Ave SW it means that my surroundings will change whole scale from the neighbourhood that I have invested in socially and financially; the result will be row housing and associated basement suites on 3 sides of my property. Should these re-zonings transpire, and there is every indication by past City practice that they will, then the decision that I and other neighbours have made to enter and sustain living in this part of the community because of the physical, environmental and financial security the location represents will be wholly undercut.

- The LAP rightly recognises that the COVID-19 pandemic had transformed the way Calgarians live, work and move. Given that downtown commercial property vacancy rate is circa 30% (notably this figure does not include property that is leased but which lies empty due to work from home policies no matter how so devised) and with forecasts for this to remain for the medium and possibly long-term future, then it must immediately call into question any current re-zoning to increase density. There is simply no current need or demand and this situation is likely to remain well into the future, and this is not only due to COVID-19 but also the long-term transition away from fossil fuels reducing the need for corporate space in downtown Calgary. This is all the more reason to pause ad-hoc density re-zoning until Municipal and Area Planning processes can consider the full import of COVID-19 and energy transition.

In summary, this Application should be rejected for the reasons stated above, and whether taken jointly or severally.

Should you have any questions or require further commentary please do not hesitate to contact me.

Yours faithfully,

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