

# Community Association Response

August 9, 2022

Circulation Control  
Planning and Development  
City of Calgary  
P.O. Box 2100 Station M  
IMC 8201

Attention: Kieran Slattery, File Manager

*Via Email: Kieran.Slattery@calgary.ca*

August 8, 2022

Dear Mr. Slattery,

**Re: Application for Change in Land Use RC-2 to R-CG LOC2021-0168 at 1845 18A St SW**

We write to register with you our opposition to the above-noted Application for change in land use from R-C2 to R-CG, LOC2021-0168. We support community members and surrounding neighbours in their opposition to this proposal and agree that their objections are well-founded.

**Opposition to the Proposed Change in Land Use**

The proposal to change the zoning to R-CG for this part of the community is wrong from a planning perspective. The zoning change is to allow at least 4 townhouse unit type development on the site. The big problem is that the developer can also add four secondary suites below the units of no more than 45 sqm, and have no parking provided for them. This has happened almost everywhere this zoning has been applied and has had massive impact on immediate neighbours. We are concerned about this type of spot-zoning without a holistic assessment of the specific location characteristics of the site. Given the site constraints, the community strongly questions the appropriateness of the proposed rowhouse use for the site.

Furthermore, the lack of a laneway for this property exacerbates traffic and parking issues and despite more relaxed planning criteria, this site is likely best suited to a one or two-dwelling unit development. The parking solution for the site will be an issue with the steep nature of the site and the higher volumes of traffic along 19th Avenue. Motorists use 19 Avenue as a through route to avoid 17th Avenue, as is confirmed by the Bankview Area Redevelopment Plan ("ARP")<sup>1</sup>. Moreover, Scarboro residents are using Bankview to access their neighbourhood for Scarboro's benefit. This negatively affects our community. The Bankview ARP underscores that "short-cutting of traffic through the community exists as a potential problem" (See pp. 26 to 28 of Bankview ARP – Supporting Information)<sup>1</sup>.

We also note that much parking in the area is restricted due to the commuter parking there as well as staff from the Medical Centre on Richmond Road. Vehicles will have to back out onto

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<sup>1</sup> The Bankview ARP may be downloaded from url:

[https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjdsfXyz6j4AhXvGTQIHtFtDbAQFnoECA0QAQ&url=https%3A%2F%2Fpublicaccess.calgary.ca%2Fildm01%2Ffilelink.exe%3Ffunc%3Dccpa.general%26msgID%3DSTTrATKArrF%26msgAction%3DDownload&usg=AOvVaw1LoU9w8H-jleTxA\\_M4QGve](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjdsfXyz6j4AhXvGTQIHtFtDbAQFnoECA0QAQ&url=https%3A%2F%2Fpublicaccess.calgary.ca%2Fildm01%2Ffilelink.exe%3Ffunc%3Dccpa.general%26msgID%3DSTTrATKArrF%26msgAction%3DDownload&usg=AOvVaw1LoU9w8H-jleTxA_M4QGve)

a busy street distracting other drivers from children crossing to nearby schools and Scout Hall. We concur with community members' request that a traffic study be completed as current traffic routing decisions have left the intersection of 19 Ave and 19 Street with a very high traffic volume, including both motor vehicles and bicycles. The Bankview ARP recognises 19 Avenue and 19 Street as being a particularly difficult intersection (See p. 26)<sup>1</sup>. The traffic study should give specific reference to Scarboro destined traffic transiting through Bankview.

In addition, the zoning for this type of development has very little amenity space or room for any landscaping, greatly overlooks the adjacent neighbours' privacy, and allows for much greater massing than an R-C2 zoning. Potentially eight units or more is a huge increase in density from the previous one residence on the site. This part of the community has several heritage brick homes from the original CP Rail brick masons (1890 to 1910), as well as several new single family homes on the narrow lots. The density is inappropriate, an increase in massing and use, and will have negative impact on an attractive and well-scaled part of the community.

It is important to note that in the Bankview ARP (Fig. 2, Land Use Policy on p. 4) the subject site and 18A Street area are designated as "Conservation" area. The ARP encourages preservation and enhancement of existing dwellings, and redevelopment should be limited to one and two family dwellings which reflect surrounding developments (section 3.1.2 on p. 3). In addition, the ARP directs that the topography of the land needs to be considered. It is relevant that the subject site has substantial grade issues. The Inner City Plan, a non-statutory policy plan that applies to Bankview and which is referenced in the ARP, also states that conservation areas should be preserved. The proposed type of density allowed under the proposed R-CG zoning would result in an intrusion into an established conservation area. In the community's view that will be a mistake. The Community believes the objectives of the ARP should prevail.

#### **Request that the Administration Treat the Amended Application as a New Application**

Members of the community became aware as recently as May 16, 2022 that the applicant wants secondary suites for this location. The applicant hasn't been transparent and made material changes to the application without community engagement. As the initial application package stated "Not Including Secondary Suites", the change in land use considered by the public, community members and the Bankview Committee in February 2022 was for 4-unit housing, only. As a result of this material change in the applicant's proposal, the Bankview Development Committee held a meeting on June 7, 2022 which determined that the amended Application ought to be treated as a brand new application for consideration. We would urge the Administration to do the same as the community and the public at large has not had an opportunity to properly consider and provide comments to the proposed change in land use for a development that wants secondary suites on each of the 4 dwelling units.

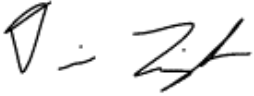
#### **Request for Concurrent Development Permit Application with a Detailed Plan**

We would also urge the Administration to request the applicant to make a concurrent development permit application with a detailed plan. Several community members asked for this specifically because they found it difficult to see how a building with four, and now, eight separate household units would be possible on this site. While we realize that the Land Use Bylaw does not count secondary suites towards density, the community nevertheless is of the opinion that the subject site is not appropriate for the development as proposed due to its challenging site characteristics. We support development that demonstrates a properly

thought through plan and can show that would be an improvement to the community. The current land use proposal, however, lacks planning merit.

Thank you in advance for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read 'D. Limpert', with a stylized flourish at the end.

**Devin Limpert**  
President  
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c.c: Ryan Agrey, Chair, Bankview Development Committee, via email:  
[development@bankview.org](mailto:development@bankview.org)