

Community Association Response



NORTH GLENMORE PARK COMMUNITY ASSOCIATION

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Dec 19, 2022

The City of Calgary

Planning & Development Dept.
700 Macleod Trail
Calgary, AB T2P 2M5

Attention: Quadri Adebayo (Planner)
quadri.adebayo@calgary.ca (via City Development / Land Use portal)

Dear Mr. Adebayo,

**Re: LOC2022-0156 (2131 – 50th Ave SW)
Land Use Amendment Application (R-C2 to R-CG)**

This letter is submitted on behalf of the North Glenmore Park Community Association's (NGPCA) planning applications review committee (PARC). We previously filed a letter of concern with respect to a proposed Direct Control (DC) application proposing much the same built form for this site. This application has been adapted to a "mid-block R-CG" (i.e. row house mid-block form) as anticipated following Council's October 4th amendments to Land Use Bylaw 1P2007.

Despite the new (or modified) district, PARC retains many of its previous concerns.

On November 23rd, 2022 we were circulated with a request to comment on the above application, and we appreciate the opportunity to provide our comments on behalf of NGPCA / PARC.

While this application is for a land use redistricting (often referred to as "rezoning"), we benefited from a public open house presentation made by the Proponent and its consultants, at a forum sponsored by PARC on Thursday October 27th, 2022.

The owners of the parcels immediately adjacent to the subject parcel are strongly opposed to this land use amendment application. PARC supports their concerns, and we have endeavoured to summarize them into the relevant land use amendment and development permit (the proposed dwellings will likely be permitted, offering little or no appeal) silos:

LAND USE AMENDMENT

- **The new district is unnecessary (no demonstrated need).** The existing built form is one (1) dwelling unit; the site owner can create 4 times the current density within the confines of the current R-C2 land use district.

- **Rental - yes; Affordable - no.** While the proposed redevelopment will offer rental accommodation, for a minimum of 10 years (according to the applicant), there is no evidence of this being "affordable housing".
- **This is not "gentle density".** While the NGPCA supports the addition of "missing middle" housing (North Glenmore Park likely has one of the highest rates of approval of any community for end-of-block R-CG development), the proposed land use redesignation from R-C2 to mid-block R-CG represents the antithesis of what has been described as "gentle density". "Missing Middle" housing includes both semi-detached and stacked fourplexes, both forms currently available within the existing R-C2 district. "Gentle density" and the "Missing Middle" housing, as envisaged by architect Daniel Parolek, is a range of housing forms or types between single-detached houses and apartment buildings and includes duplexes, triplexes, fourplexes, rowhouses, townhouses and low and mid-rise buildings.
- **The existing R-C2 district already responds to the "Missing Middle" form.** Missing Middle doesn't necessarily mean that ALL low density built forms should find favour in every location. The concept of "gentle density" - as described by Architect Daniel Parolek - is to find built form that nicely reflects the existing housing, but adds opportunity for additional dwelling units:

*"SmartDensity's premise is that our vision for gentle density provides an opportunity for cities to create liveable communities, one's where we can maintain the integrity of the surrounding built environment while also introducing low scale pedestrian-oriented family-sized units." **

[* The above quotes from the Toronto website: <https://smartdensity.com/>]

- **Avoid 'spot zoning'.** Alternatively, applicants can pick their sites strategically and not otherwise "spot zone" - effectively attacking the existing established built form in the community. Again, applying the term "gentle density", an applicant might choose to redesignate the parcel adjacent to an existing end-of-block R-CG, thereby limiting the potential negative impact by 50% given that at least one group of adjacent residents have already demonstrated their preference for this form of density.
- **Compromised Neighbouring Interface:** Again, this is an argument against "spot zoning". The purpose of the existing R-C2 district is to ensure new development is contextually sensitive. Given recent trends, it is unlikely that any applicant will be satisfied with anything less than the maximum built form allowable in the proposed mid-block R-CG district. Indeed, nothing stated by the Proponent group at the open house on October 27th suggested anything other than maximizing site yield. The existing Land Use Bylaw 1P2007 is imbued with the notion of "contextual sensitivity". A mid-block application of this nature is the antithesis of what was contemplated by the current (and lawful) Land Use Bylaw.

Rather than an organic change to our community, this proposal inserts itself unapologetically into the middle of an otherwise stable North Glenmore residential block. It's not "gentle" - it's abrupt.

DEVELOPMENT PERMIT APPLICATION

It's not entirely clear whether a mid-block R-CG development will be permitted or discretionary. If the former, then there will be no appeal process for the neighbours. Given that uncertainty, PARC also recognizes potential negative impacts from the expected subsequent development permit application:

- **Compromised Traffic + Road Network Safety:** The proposed development is not only situated directly across a school, but is also adjacent to two more schools within a block. This paired with the presence of nearby parks, greenspaces, and playgrounds, the increased density resulting from such a development directly compromises the traffic and safety of the neighborhood as a whole. With the increased traffic flow, PARC strongly advises the City to carefully consider the demographics that may be put at risk and can be negatively impacted.
- **Insufficient Parking Spaces:** the 4 on-site parking stalls proposed for 8 dwelling units will likely be insufficient to accommodate the current residential demand we continue to see associated with R-CG development in our community. It's one thing however to have off-site parking spillover on a corner lot. With the very limited and restricted street parking on 50th Ave, this proposal fails to adequately address on and off-site parking impacts. While suggested by the community at the October 27th open house, there has been no evidence since then to demonstrate that additional viable parking might be developed on the north side of 50th Avenue SW; it is PARC's view that this parking accommodation is a necessary precursor to any significant site redevelopment on 50th Avenue given the current lack of available parking on the south side of 50th Avenue SW
- **Alternatives to 8 dwelling units:** There are a number of potential site development iterations that can still add a minimum of 3 additional dwellings to the site. Any one of them will avoid the very real imposition of a continuous 2-storey wall looking down over the adjacent residents' rear yard amenity space.
- **Infrastructure Upgrades.** We have information that our community was built with deficient stormwater infrastructure (evident in the notable deficiency of storm catchments throughout the community). The relatively flat community landscape is built on sandstone and shale plates intermixed with clay pockets. Surface drainage is poor and problematic. The community is uncertain whether City Water Resources is aware of this significant local issue or whether they are prepared to move forward with required upgrades to accommodate the reduced surface absorption and storm water management associated with new redevelopment. As more new redevelopment proceeds, the drainage issue is compounding. The City will have to account for necessary infrastructure improvements arising from expected redevelopment.
- **Excessively High Density for a Relatively Small Lot:** With the R-C1 and R-C2 districts remaining as the preferred housing choice in Established Communities like North Glenmore, the community would like to retain its current land use mix, with a blend of low density between 50th and 54th Avenues and exclusively R-C1 south of 54th Avenue.
- **Lack of Community Fit:** With the increased building height and parcel coverage, the physical design of the development will not only be a significant building massing and privacy intrusion on the immediate neighbours, but will also compromise the overall street rhythm within the block face of the neighbourhood. Additionally, the reduced soft landscaped area and canopy coverage will likely negatively impact the ability of the site to manage rainwater and snow melt.

If new denser redevelopment is to occur, it should strive to respect the same contextual envelope of neighbouring structures (setback, site coverage, height, etc.).

- **Shortage of waste facilities; Amenity Space and Storage Units:** The Proponent is suggesting an arrangement with City solid waste services whereby it will arrange for private recycling. This may work so long as the ownership of the development remains in one party. It is uncertain how this arrangement might continue with eventual condominium conversion. Similarly, the proposed development at 2131 50th Ave SW lacks the storage amenities that would normally be sufficient for 8 units. There are limited walkways from the front units to rear parking (particularly with the proposed vegetation suggested by the Proponent) and outdoor and bicycle storage options don't seem fully conceived. It is unclear how the proposed amenity space will be shared within the courtyard lying amidst the proposed 8 dwelling units.

We conclude by acknowledging that PARC's role is advisory in nature. We have attempted to provide input into a matter which most importantly and immediately affects those who are adjacent to the proposed development site and by the resulting reconstruction consequences. Attached is a compilation of the affected neighbours' views and opinions. We merely ask that the following decision makers each take into account their role in this land use application and the concerns raised by the citizens whose lives are most impacted by this decision process and the role of each level of review and approval:

- City planning staff, in their role as land use co-ordinator and development authority
- Calgary Planning Commission (CPC), in reviewing and recommending all land use applications
- Calgary City Council and each of its members, as the ultimate decision-making authority on land use amendment applications

When the mid-block R-CG amendments were approved by Council on October 4th, certain members of Council suggested that Council was only approving the general rules about this new form of housing - that *the true test would come when actual applications were submitted for consideration to Council*. This is one of the first of such applications. We ask, respectfully, that Council consider the full impact of such applications on a case-by-case basis. We urge Council to not see such applications as a meaningful response to the Municipal Development Plan's density and growth targets for inner city redevelopment. The current application is, plain and simple, "spot zoning" with all the negative elements associated with such one-off applications. Spot-zoning applications such as this are not a thoughtful approach to planning - they are an opportunistic overreach that in pretending to reach lofty goals only impose ill conceived and insensitive building forms over the voices of the affected community.

Our community supports contextually respectful and sensitive redevelopment proposals. This is not an example of that type of application, unfortunately.

On behalf of the affected neighbours of the North Glenmore Park community we ask that each of the three decision making bodies referenced above NOT SUPPORT this application as proposed. Please recommend that Council "refuse" this application as proposed. Alternatively, if a redesignation is being considered, please limit it to the less intense "R-CGex" land use district.

Sincerely,

North Glenmore Park Community Association

per: Arshan Hussaini
Chair, PARC

Copied to:

North Glenmore Park Community Association (Attention: J. Ring-McClure, President)
Ward 11 Councillor Courtney Penner
CivicWorks Planning + Design (Attention: Kalika Hoogstraten)
Immediately Affected Adjacent Residents

Attached:

Feedback Letters from the Neighbouring Residents to the Land Use Redesignation