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Distrib - Letter

CITY CLERK'S DEPARTMENT

LOC2023-0081 Land Use Redesignation Application

I live at 24 Glenview Dr. SW. In preparing this submission, I consulted the Municipal Development Plan (MDP), other City of Calgary documents and the application. I have quoted extensively from the relevant sections of these documents.

The city of Calgary document "Why do developed neighbourhoods need to grow & evolve?" addresses six topics.

The topic "Maintaining vibrancy and character" states:

*...Community vibrancy is maintained by ensuring new development is integrated with existing development in a way that **retains and enhances unique community character** and historic resources. (emphasis added)*

The Municipal Development Plan (MDP) distinguishes between communities and neighbourhoods. It states:

Communities are a collection of neighbourhoods that provide a fuller set of amenities for residents. (MDP page 34/ PDF 42)

A Complete community is defined as:

A community that is fully developed and meets the needs of local residents through an entire lifetime. Complete communities include a full range of housing, commerce, recreational, institutional and public spaces. A complete community provides a physical and social environment where residents and visitors can live, learn, work and play. (MDP PDF page 153)

Every neighbourhood need not meet all the needs of its residents. Nor, is it necessary for every neighbourhood to lose its unique character as established areas increase their density.

The recently approved Local Area Plan for the Westbrook Communities includes 10 neighbourhoods. We, the residents, have chosen where we live because of existing amenities and the unique characters of our neighbourhoods. Change is inevitable and I do not oppose it. However, I have concerns regarding this application for land use redesignation to MU-1.

My reasons for concerns regarding this application are related to the following three issues:

1. Vacant land and approved projects
2. The degree of intensification proposed
3. The height applied for in the proposed rezoning

1. Vacant Land and Approved Projects

There is currently a lot of vacant land in the Westbrook Communities, most significantly the area adjacent to Westbrook Station. There is a large development in progress in the Shaganappi area and numerous other developments are underway or have been approved. The completion of these developments will significantly increase the density of the Westbrook Communities. Given the increase in density from already approved projects, I suggest a pause to assess their cumulative impact on the density intensification in the Westbrook Communities as a whole. Some

neighbourhoods are supportive of greater density, while others, including Glendale (at least all the people I have spoken to) would prefer to gradually increase density.

2. The Degree of Intensification Proposed

The MDP land use policies include:

- a. *Recognize the predominantly low density residential nature of Developed Residential Areas and support retention of housing stock, or **moderate intensification** in a form and nature that respects **the scale and character of the neighbourhood**. Local commercial development within residential areas, that is of a scale and intensity that supports residents' commercial needs is supported. (MDP page 102/ PDF 110) emphasis added*

Glendale appears to be an Established Area as described in the MDP.

The Established Area comprises residential communities that were planned and developed between the 1950s and 1990s. They are primarily residential communities containing a mix of low and medium-density housing with support retail in relatively close proximity. The road network is a blend of modified-grid and curvilinear. These are stable residential communities with limited redevelopment potential over the next 30 years. Populations have declined from their peak and housing stock is generally in good condition. (MDP page 104/PDF 112)

Land Use Policies for Established Areas:

- a. *Encourage **modest redevelopment** of Established Areas.*
- b. *Redevelopment opportunities should be focused on the Neighbourhood Activity Centres, though changes to other sites may provide opportunities for redevelopment over time.*
- c. *New developments in Established Areas **should incorporate appropriate densities**, a mix of land uses and a pedestrian-friendly environment to support an enhanced Base or Primary Transit Network. (MDP page 104/PDF 112) (emphasis added)*

The MDP sets density thresholds to be attained. There are numerous references to attaining these thresholds over time. For example, the table on page 137(PDF 145) has a 60-year density goal of 27 people per hectare.

*Minimum thresholds of **100 people or jobs per gross developable hectare are needed within walking distance of a transit station or stop** (approximately 400 metres) to support service levels of 10 minutes or less over extended periods of the day. (MDP page 31/PDF 39) (emphasis added)*

*Where higher orders of employment or residential intensification are desired in MACs or **Urban Main Streets** to support numerous routes of the Primary Transit Network, minimum thresholds of 200 people or jobs per gross developable hectare should be achieved within walking distance of transit stations and stops. **These densities can be accommodated through a variety of***

***different building scales as the station area develops over time. (MDP page 31/PDF 39)
(emphasis added)***

An appropriate transition between the Neighbourhood Main Street and the adjacent residential areas is required. Transition should generally occur at a rear lane or public street. These transitions should be sensitive to the scale, form and character of surrounding areas, while still creating opportunities to enhance the connectivity with the community. (MDP page 100/ PDF 108) (emphasis added)

Application LOC2023-0081 for land use redesignation to MU-1 is for .25 hectares. The applicant indicates that the proposed development would be six stories high with 102 units. To put this in perspective, I counted the number of units on the block currently as 36, the adjacent block of Georgia St. to Glenview Dr. has 26 units and the western block from Glenview Dr. to Gateway Dr. has 38 units. The intended development is replacing four dwelling units with 102 units, as many as are on three blocks in the surrounding neighbourhood.

The location for which redesignation is applied is within walking distance of a transit station. The minimum threshold target is 100 people x .25 hectares = 25 people. The intended use is for 102 units, for a minimum of 102 people or four times the minimum threshold. The assumption in the Municipal Development Plan examples is that there will be on average two people per unit. Using this assumption, the density would be **eight times** the minimum density threshold.

The higher density for Urban Main Streets is 200 people per hectare. The Main Street designation applies to 17 Ave from slightly west of 37 St. eastward. The site proposed for redesignation is not part of a designated Main Street. Nevertheless, the intended use would be between twice the Main Street density threshold (200 x .25 hectares = 50) and four times the density threshold using the assumption of two people per unit in the MDP example.

Table 2-1: Comparison of population intensity to housing density (MDP page 32/PDF 40) suggests that to meet the threshold of 200 people per hectare, stacked townhouses or low-rise to high-rise apartments are appropriate. Row housing is also appropriate with mixed commercial and residential developments.

This redesignation application is the first in Glendale since the Local Area Plan was approved. To approve a redesignation that exceeds the density of the highest threshold in the MDP (200 people per hectare) would set a precedent and change the nature of the Glendale. Further as indicated in my count of units surrounding the property, it is not consistent with the character of Glendale, a neighbourhood that was initially zoned for a single residence per lot.

I recently walked in Kensington looking at how intensification was achieved. I saw numerous examples of tasteful row housing. I would support a rezoning that would permit row houses in the area or an apartment building of two or three stories. A density of 100 people per hectare would need housing for 25 people. This could be achieved with a development of eight to twelve townhouses if some were occupied with families who had children. A density of 100 people per hectare could be achieved with an apartment building with 13 to 25 units. The required height would likely be two stories and would be compatible with the neighbourhood. Such a building could be designed to add stories in the future if the nature of the neighbourhood changed.

3. The height applied for in the proposed zoning

I understand, based on discussions with a city employee, that a key aspect of an MU-1 zoning is that the maximum height is specified in the zoning decision. Twenty-two metres is much higher than the neighbouring bungalows and split-level houses.

The diagram on page eight of the application appears to be based on the adjacent buildings being three stories high (the maximum allowed). This is not the case. The majority of houses in the area are bungalows with a few split-level houses – these are one or one and one half stories compared to the intended six story building.

The discussion of Main Street intensification in the MDP refers to a transition sensitive to the scale, form and character of surrounding areas. I submit that a similar transition should apply in all development. A six-story apartment is not sensitive to the scale and form of the surrounding area.

Conclusion

I understand the distinction between a land use redesignation and a development permit. However, if a redesignation to MU-1 with a height of 22 metres is approved, it will be more difficult to oppose the development indicated by the applicant.

As discussed above, I consider the indicated development to be inconsistent with the nature of the neighbourhood. It is well in excess of the density threshold for a location within walking distance of an LRT station and is not sensitive to the scale, form and character of surrounding areas.