

# Community Association Response

**Re: Application for Land Use Amendment: LOC2023-0139**

**Location: 637 53 Ave SW and 702 53 Ave SW**

Dear Sir/Madam,

This letter is in response to the subject application.

We would first like to address how this application is not within the spirit and the stated policies of the Municipal Development Plan, the LAP Guidebook and the current LAP process, insofar as the unique characteristics of Windsor Park are affected. Specifically, we refer to:

- MDP Section 2.2.5 STRONG RESIDENTIAL NEIGHBOURHOODS:
  - Objectives: The final paragraph states:
    - “The City promotes infilling that is sensitive, compatible and complementary to the existing physical patterns and character of the neighbourhoods”
      - *as discussed below there are several ways that the proposed development is not complementary to Windsor Park*
- MDP Section 2.3.1 RESPECTING AND ENHANCING NEIGHBOURHOOD CHARACTER:
  - Objectives:
    - “Respect and enhance neighbourhood character and vitality”
    - “Attention must be paid to ensuring that appropriate local context is considered when planning for intensification and redevelopment”
  - Policies:
    - “Ensure an appropriate transition of development intensity, uses and built form between areas of higher and lower intensity, such as low-density residential areas and more intensive multi-residential or commercial areas”
      - *While Windsor Park does not dispute that it is a neighbourhood that contributes significantly to higher volume housing, high-density has appropriately situated on the periphery of the community adjacent to Activity Centres and Main Streets. The lower-density core of the community has a different and complementary character that provides choice and balance to the broader Windsor Park.*
    - “Ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern”
      - *Infill and duplex construction has been complementary to the established character of the core of the community*
      - *Likewise, high-density developments adjacent to Activity Centres and Main Streets have been within the physical development*

*pattern and are consistent with the established character of those areas.*

- “Ensure that the preparation of local area plans includes community engagement early in the decision making process that identifies and addresses local character, community needs and appropriate development transition with existing neighbourhoods”
  - *The Chinook Communities Local Area Plan has only recently kicked off. Consideration of this application prior to the completion of the LAP is premature as the Plan is critical to address the nature of the changes being requested.*
- MDP 3.5 DEVELOPED RESIDENTIAL AREAS
  - Section 3.5.1 GENERAL POLICIES FOR DEVELOPED RESIDENTIAL AREA
    - Land Use Policies:
      - “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”
      - “b. Redevelopment within predominantly multifamily areas should be consistent with the established pattern of development...”
        - *The core of Windsor Park should be considered within policy “a” above and intensification be kept to infill and duplex development.*
        - *Multi-family developments have been and should continue to be along the periphery of the greater Windsor Park community.*
  - Section 3.5.3 ESTABLISHED AREAS
    - Land Use Policies:
      - “a. Encourage modest redevelopment of Established Areas”
        - *As discussed below the large inventory of corner lots with old housing stock could result in significant and material redevelopment in the core. This is definitely not “modest”*
      - “b. Redevelopment opportunities should be focused on the Neighbourhood Activity Centre”
        - *this has been the pattern at Windsor Park, primarily on the streets adjacent to Chinook Centre and at the intersection of Elbow and 50<sup>th</sup> Avenue. These developments are not opposed as is evidenced by the current construction of the Elbow 5 Eight Apartments that will add 255 residences to the community*
- MDP CORE INDICATORS:
  - Density: City of Calgary 2018 Density: 24.7 people per hectare
    - *Using 2019 Community Profiles data Windsor Park has a density of 61 people per hectare, much lower than the City average. The average of*

- the other communities that comprise the “Chinook Communities” is approximately 20 people per hectare.*
- *Furthermore, based on Communities Profile data, the split between low-density and high-density housing in Windsor Park is 30:70 (low:high). The overall average for the City of Calgary is 67:33. Windsor Park has more than double the weighting of high density than Calgary averages.*
  - Urban Forest: Target is to increase significantly
    - *Row house development has a significant negative impact on mature tree coverage as is evidenced by existing developments.*
    - *Infill houses and Duplex development is very accommodative to existing stands of mature trees*
- **LOCAL AREA PLANNING GUIDE: Prepared to guide the path to creation of Local Area Plans**
    - 2.8 Neighbourhood Local Policies
      - *“c. Buildings forms that contain one or two residential units are supported in Neighbourhood Local, Limited Scale”*
      - *“e. Building forms that contain three or more residential units should be supported in the following areas:*
        - *near or adjacent to an identified Main Street or Activity Centre*
        - *on higher activity streets”*
          - *this has been the practice and is supported by the community*
        - *“where the parcel has a lane and parking can be accommodated on site”*
          - *the type of parking that is evident on existing row housing is impractical in terms of size and access and in terms of storage and location of city garbage cans*
      - **Single-detached Special Policy:**
        - *Something along these lines would be appropriate in the “core” of Windsor Park, but also including semi-detached and duplex housing form*
  - **CHINOOK COMMUNITIES LOCAL AREA PLAN**
    - This two-year process will “create a plan to **guide growth, change, redevelopment and community improvements** in the community and surrounding area”
      - *The working group for this process has only been assembled in the Spring of 2023 and has held one meeting.*
      - *Notwithstanding that the LAP is not intended stop development from proceeding while plan is being developed, given the number of active and potential for significant additional row house developments, it is premature for the City to be approving the type and scale of re-zoning in the Core of Windsor Park before a Local Area Plan is approved*
  - **CUMULATIVE AFFECT:** *This application must not be considered in isolation. There is one similar development currently under construction that was approved in 2022 plus there are two additional similar applications scheduled for City Council decisions. Very*

*recently a corner lot recently sold on the corner of 6<sup>th</sup> St and 55<sup>th</sup> Avenue that has the characteristics of the re-zoning applications discussed. Furthermore, the precedent that could be set by approval of these applications could set off a flood of similar projects on corner lots throughout the core of Windsor Park. We have counted roughly 40 lots with similar characteristics of pre-existing structures that could be developed in relatively near term. Development of all corner lots in the R-C2 zoned area into row housing could affect as much as almost one third of this core residential area in terms of converting it to high-density.*

- **DIVERSITY AND HOUSING CHOICES**
  - *Windsor Park provides a broad range of high-density to low-density housing choices. There is not a compelling reason to change the nature of housing types in the core of the community given the variety and number of choices that are available in the greater Windsor Park area.*
  - *Windsor Park shelter costs are below city averages (Community Profiles 2019)*
  - *The demographics of Windsor Park (Community Profiles 2019) reflect a diversity of residents that is very consistent and aligned with that of the City*
  - *Rental housing is significantly higher than the Calgary average, suggesting more affordable housing options are available in Windsor Park*

In view of these points we respectfully submit that this application should not be approved.

Thank you

Regards,

Windsor Park Community Association