



Blanket Rezoning Infrastructure Sub-committee Report

4/5/2024, 2024

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Request

It is requested that the following motion be made and approved by Council:

That with respect to Report CPC2024-0213, the following be approved:

Request that Council refer Report CPC2024-0213 back to Administration to:

1. Investigate and report on existing and proposed Local Area Plans that may have infrastructure capacity available to support increased density in the form of the proposed R-CG Land Use
2. Prepare Growth Evaluation Criteria for Established Areas (similar to the Growth Application Evaluation Criteria used for Greenfield Development) to show how the proposed growth meshes with Municipal Development Plan/Calgary Transportation Plan (MDP/CTP) alignment, Market Demand, and Financial Impact on the City and non-municipally controlled third parties (i.e. hospitals, schools, EMS, utilities)
3. Prepare a Business Case Template for Established Areas (similar to the Template used for Greenfield Development) to show the economic justification for development within a Local Area Plan
4. Prepare a process for determining locations within the Established Area of the City which will support the proposed R-CG Land Use in light of Items 1,2, and 3 above.

and report back to Council no later than October 8, 2024

Executive Summary

Calgary City Council is considering approving a bylaw that rezones 216,117 properties to R-CG and 92,151 properties to R-G, effectively 'Blanket Upzoning' the majority of the city, to allow for more efficient development of a range of low-density housing forms such as single-detached, semi-detached, duplex dwellings, townhouses and rowhouses. It is a proposal that has not been given a thorough vetting as there are multiple infrastructure issues that will likely only become apparent once development starts to take place in an uncontrolled fashion.

This is an issue that affects all residents of the City of Calgary however, it appears that an economic evaluation through a business case analysis has not been put forward to show how the implementation of considerable intensification of existing communities will be accounted for, given the significant increases in costs for upgrading infrastructure within the built-up areas of the City. Increases in density in the established areas of the City will undoubtedly require that sanitary and storm sewage, as well as water systems, be upgraded to accommodate the significant population increases. Additionally, no traffic impact analyses have been done to indicate the changes to the level of service that will result from the increase in traffic that will result from this proposal. Similarly, our emergency services will also be strained, resulting in the requirement to increase the infrastructure required for police and fire services. Recreation facilities and libraries in the established areas will also have to be upgraded to accommodate new residents within the established areas. All of these items will have a direct effect on all taxpayers as the cost of these improvements will have to be paid for on a City-wide basis.

There are also additional costs that will be required to upgrade the electrical distribution and communications systems. The costs to dig up pavement in the existing parts of the City to accommodate this infrastructure will be extraordinarily expensive. While these items are not taxpayer-supported, they are ratepayer-supported and will require increases to utility costs which are only recovered through increased utility rates.

More broadly, issues such as the location of hospitals and schools have not been addressed to any great extent. Hospitals have been removed from the inner city and the land has been reutilized. There really is no place to build a new hospital in the inner city without incurring significant costs. Similarly, we have removed schools in the established areas of the City and have repurposed some of the sites. In some areas there are lottery systems in place to accommodate new students at existing schools due to the lack of space for the students. There is nowhere else to build new schools unless existing development is removed, and the land is purchased. These issues are not City funded but they do affect all residents as the funds for this development will still come from the same source. There is only one taxpayer.

The introduction of the proposed Land Use Redesignations has extraordinary implications for all residents of the City of Calgary. This report notes the implications of these concerns and provides an alternative methodology to determine where growth can be accommodated in the established areas of the City.

Introduction

The report accompanying Calgary's Housing Strategy 2024-2030 - Land Use Amendment Citywide, LOC2024-0017, and Land Use Bylaw Amendments¹ is lacking in reference to the infrastructure and the cost to provide it if Council approves the increase in densities across the City through blanket rezoning as recommended by the Calgary Planning Commission.

The report states that "If the recommendations of this report are approved, Administration recognizes there is a need for strong capital investments in the Developed Areas to enhance public amenities. The Housing Strategy includes actions to consider this." Unfortunately, there are no real actions that are noted in the report to back up this statement. It simply states "Future business plans and budgets will monitor and respond to shifting patterns in growth and redevelopment as a result of this proposed change."

Action 1C.13 of the Home is Here Report² indicates that the City is committed to providing infrastructure in accordance with communities that have experienced applications that have facilitated more housing. The cost of the infrastructure does not appear to be known at present. It would make more sense to determine where capacity is available to provide services such as; storm and sanitary sewer collection, water distribution networks, roads, transportation networks, emergency and police services, libraries, recreation facilities, electrical and telecommunication distribution systems, schools, and healthcare facilities.

The plan to increase density in all established areas throughout the City on an equitable basis has, therefore, not been well thought out and amounts to "flying a plane while building it." Approval for Land Use for additional housing units should take into account the infrastructure required to support it and it is contended that City Administration should look for areas where density can be supported with existing infrastructure before the Land Use is changed.

There are multiple locations where density can already be supported throughout the City and certainly there are areas which require additional housing units in order to refresh and rejuvenate the existing community. Moreover, there are locations throughout the City which should be redeveloped to support the existing infrastructure such as schools which are underutilized while other areas have schools which over capacity and have waiting lists.

This report attempts to look at the requirements for each type of infrastructure and makes recommendations as to how the City could review its existing systems and make an informed decision as to where density can be located to take advantage of infrastructure capacity that may exist within the system and then look to promote growth in those locations.

Land Use changes in those areas can then be determined and some certainty can be introduced for the development industry to create additional housing. If this work is not undertaken, some areas of the city could exhibit capacity constraints and investments made by developers for the acquisition of land in those areas will be stranded, resulting in a loss of income for developers and exposing the City to additional risk when developers seek to require the City to increase capacity to support the new Land Use. This will almost certainly be counterproductive to the objective of providing more affordable housing throughout Calgary.

1. Deep Utilities

1.1. Sanitary Sewer Storm Sewers and Water Distribution

The sanitary sewer collection system is well-known by the City engineers and bottlenecks exist through the system. A case in point was noted several years ago when development in the City's Northwest was curtailed while the system was upgraded. It is expensive to lay down new pipe under existing roads, as the working area is confined, worker safety issues become more apparent when the trench for the sewer must be supported and the road rebuilt after the sewer is placed. Early identification of existing capacity issues should be done to identify any capital expenditures required before they become an issue and development is halted.

Similar issues exist for storm sewers. The proposed changes in the Land Use rules indicate that lot coverage will increase from a maximum of 45% to 60% which would be an increase of 33% of the impervious area on a lot. City engineers should look for areas which can handle the increase in storm flow. Additionally, water quality issues will become apparent as many parts of the established areas of the City directly discharge into the river without the use of a storm pond to reduce both the peak flow and to remove the contaminants from stormwater.

The potable water distribution system may also have constraints. Fire flow capacity may be challenged with additional housing units and an increase in density over the original design parameters. Once again, we should look to areas which have capacity rather than applying density without forethought.

Currently, there is no levy system in place to support any capital costs required for deep utilities in the established areas. Many of these areas have already had levies placed against them for trunk systems and it may not be possible to levy against this new infrastructure if new services are required. As the cost of an upgrade may not be economically feasible for a single developer to support an overall improvement in service capacity, the costs will have to be borne by the overall taxpayer if trunk services must be constructed to support blanket densification.

2. Transportation Network

2.1. Roads

Overall, the City's road system in established areas has not been designed for significant increases in density. Traffic Impact Analyses should be done to identify where capacity exists in the system to support additional density. Retrofitting road infrastructure to support additional density is an expensive process that sometimes requires the removal of housing to widen the road network, contrary to the objectives of the Strategy. Presently, there are areas where housing could be more concentrated to take advantage of existing capacity in the road network.

Should the blanket rezoning occur, the taxpayer will likely have to pay for road infrastructure improvement if growth is not planned in a manner that will limit the capital costs required for new infrastructure to support growth in established areas. Selective densification to take advantage of existing capacity will limit the cost to the taxpayer and will also mean that costs can be targeted directly to those areas that will benefit from the infrastructure upgrades.

2.2. Transit Network

Increasing density surrounding LRT and BRT stations is already part of the City's strategy and capacity exists for supporting this sort of density. Providing density along bus routes should be a priority for R-CG and H-GO and even higher density forms of housing. Many areas along bus routes have housing that is in need of a refresh. This is not a new idea as this form of density along bus routes has been supported by the City for some time. Provided the capacity is available, rezoning lots along bus routes would appear to be a sensible idea and has been supported in existing Local Area Plans.

3. Emergency Services

3.1. Fire

Some areas of the City have benefitted from reconstructed fire halls in the established area. Other areas will require improvements to the existing facilities to make sure that there is capacity in the system to support Calgarians in emergencies. It should be relatively simple to identify areas where capital improvements and increases in operating costs will have to be made to support increased density.

As there is no levy fee or charge in place in the established areas, any increase in fire infrastructure will have to be taxpayer-supported.

3.2. Police

It is also likely a simple matter to identify areas where capacity exists in police infrastructure to support increased densities. The Calgary Police Service (CPS) have metrics that can determine whether there is capacity available in the system or if additional capital and operating costs are required.

Similar to Fire facilities, increases in the requirements for CPS infrastructure will have to be taxpayer supported.

3.3. EMS

While EMS is not a City responsibility, it is incumbent on the City to properly coordinate planning for EMS with the Province to determine if there any further units needed to support an increase in housing in any particular part of the City.

4. Community Infrastructure

4.1. Libraries

Libraries are an increasingly important part of the lives of many Calgarians. New libraries require land and expanded libraries require capital expenditures. Increases in density should consider the requirements of libraries and capital should be allocated where expansion makes sense to support increases in density.

If new libraries are constructed or existing facilities expanded, the costs will have to be taxpayer-supported as there is no levy in place for this infrastructure.

4.2. Recreational Facilities

Recreational facilities are not in abundance in the established areas of the City as many, such as the YMCA and YWCA, have experienced a loss of participants and have had to close in recent years. The addition of increased housing units will place a strain on those facilities that are still in existence or will require participants to travel long distances to take part in recreational activities. New recreational facilities will require land for the development of these facilities, and it should be possible to determine where recreational opportunities exist in the established areas.

If new recreation facilities are constructed or existing facilities expanded, the costs will have to be taxpayer-supported as there is no development levy, charge or fee in place for this infrastructure.

5. Shallow Utility Systems

5.1. Electric Distribution Systems

With the advent of electric vehicles plus a desire to electrify our home heating ventilating and air-conditioning (HVAC) systems, there is concern that the electrical distribution network is not robust enough to handle the additional strains that will be placed upon it. An increased number of residential units will require an increased number of transformers to supply electrical power. Each transformer in a new community provides

services for about 12 individual single-family lots. Transformers in existing communities were generally based on 100 Amp household requirements. The increased loads that are now being requested for EV charging stations, air conditioners, heat pumps, etc. require 200 Amp servicing. In other words, Enmax may have to increase both the number of transformers and the amperage supplied by each transformer, to accommodate the sort of growth/density that is being contemplated. This will require an increase in utility rates to support the increased infrastructure required.

5.2. Telecommunication Systems

With an increasing number of people now working from home, the requirement for higher-speed internet systems is becoming a necessity. If infrastructure is not available, roads, lanes and front lawns will have to be torn up to replace outdated telecommunication services for new homes in existing communities. This will also necessitate an increase in user rates if density is not provided in a thoughtful manner.

5.3. Gas

Upgrades to the gas distribution system will likely not be required as home heating can be provided by more sustainable forms of home heating, based on the provision of additional electrical power.

6. Schools

Schools in Calgary appear to be either over capacity or under-utilized. Only a few are at optimum loads. Planning for additional density should take place where schools are currently being under-utilized to avoid closure of schools and to allow for students to attend schools in their own community. This is very important for families who do not wish their children to have to ride on the bus for hours each day to attend a school that is out of their area. Additionally, siblings will also have the ability to attend the same school together.

7. Healthcare Facilities

Two hospitals in the inner city have been removed and only one emergency services site has been constructed in the established area in the interim. Planning for increased density in the established areas must be done in conjunction with the Province to assure Calgarians that health care will be provided to accommodate a new influx of population. Additional facilities or expansion of existing sites will have to take place to accommodate this growth. Densification should take place in a thoughtful manner to support any improvements in the health care delivery system that may be contemplated.

Business Case for Densification

Similar to new communities, it is proposed that areas for growth should be identified and that a business case should be developed to support this increase in density. This could be done on a Local Area Plan (LAP) basis, whereby the infrastructure would be identified, and any capital costs required could be determined. The investments required to support the increases in density would be offset by the revenues determined from increased tax revenues, levies, utility rates and user fees. Provided a business case indicated that cash flow from the new infrastructure was positive, then the investment required could be supported and an area for densification could be identified within the LAP. This process would be used to support a Land Use Change which could be brought forward for Council's approval at the same Public Hearing as the LAP for which the area in question had been identified.

Conclusion

The additional infrastructure required to support growth should be identified at the Local Area Plan stage. This process can take a deeper look into the facilities required to support growth and capital costs for investments in growth can be determined. A business case can then be put forward to Council to determine whether it is prudent to budget for the infrastructure required based on both the costs of the infrastructure and the revenue that will be derived from the increased densification.

References

¹ Calgary Planning Commission March 7, 2024 Agenda Item 7.2.4 [Calgary Planning Commission - March 07, 2024 \(escribemeetings.com\)](https://www.escribemeetings.com)

² Calgary Housing Strategy (Objectives 1.C.1, 1.C.5, 1.C.13, etc); (Home is Here - The City of Calgary's Housing Strategy 2024–2030 Approved by Council 2023 September 16) <https://www.calgary.ca/communities/housing-in-calgary/housing-strategy.html>;

Bibliography

Reports prepared by other Community Associations:

- 1) Unassailable Case against Blanket Rezoning 07march2024 7pp
- 2) Blanket R-CG Zoning: Urban Hydrology and Natural Infrastructure 15march2024 – Scarborough Community Association
- 3) Mount Royal (MRCA) Town Hall notes 20march2024

Other information:

- 1) CREB press release 13feb2024 -
https://www.creb.com/News/Media_Releases/2024/February/CREB_opposes_City_proposal_on_blanket_rezoning/
- 2) Globe & Mail article (4plexes x Ford) 22march2024 -
<https://www.theglobeandmail.com/canada/article-premier-ford-says-its-a-massive-mistake-to-impose-fourplexes-across/>
- 3) City of Calgary Biodiversity Strategic Plan
<https://www.calgary.ca/content/dam/www/csps/parks/documents/planning-and-operations/biodiversity-strategic-plan.pdf>
- 4) City of Calgary Municipal Development Plan;
<https://www.calgary.ca/planning/municipal-development-plan.html>
- 5) Calgary Climate Strategy(2023 – 2026 Climate Implementation Plan City of Calgary);
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- 6) Inner City Transportation System Management Strategy (for City of Calgary 2002(& 2009 & 2020);
<https://publicaccess.calgary.ca/lldm01/livelink.exe?func=ccpa.general&msgID=XTTrqAgyATP&msgAction=Download>
<https://www.calgary.ca/content/dam/www/pda/pd/documents/CTP-2020.pdf>
- 7) Housing & Affordability Task Force-HATF(date?);
<https://engage.calgary.ca/HATaskForce>

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- 8) School reference document for Area 7 schools at 92% utilization;
<https://cbe.ab.ca/FormsManuals/School-Enrolment-Report-2023-2024.pdf>
 - 9) Alberta Housing Amendment Act (2022); <https://www.alberta.ca/improving-the-affordable-housing-system>
 - 10) Calgary Equity Index(date?) <https://maps.calgary.ca/CalgaryEquityIndex/>
 - 11) Nature Canada Report on Tree Equity (September 2022);
<https://naturecanada.ca/news/blog/tree-equity-bringing-the-canopy-to-all/>

City Council
City of Calgary
800 Macleod Trail SE
Calgary, Alberta
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April 15, 2024

sent via email

Re: Opposition to Blanket Up-zoning

Dear Mayor Gondek and City Councillors,

The proposal to blanket up-zone the entire city is a significant change to current planning policies and patterns of development. Density can benefit the city and communities if it is well planned. However, blanket up-zoning creates density without regard for community context.

Housing choice already exists in Calgary. What is missing is deeply affordable non-market housing options. Blanket up-zoning will not supply this.

We respectfully request the creation of evidence-based policies tailored to address Calgary's specific needs and challenges that are co-designed with Calgarians.

We, the 50 undersigned Community Associations, urge you to vote against blanket up-zoning at the public hearing scheduled for April 22, 2024.

Sincerely,

Phillip Lounsbury
President, Abbeydale Community Association

Ryan Koleyak
Bonavista Downs Community Association

Bonita McCurry
President, Brentwood Community Association

Doug McNeil
Planning Director, CKE Community Association

Daryl Connolly,
President, Cambrian Heights Community Association

Ron O'Shea
President, Crossroads Community Association

Kim Semeniuk
President, Deer Run Community Association

Lisa Poole
President, Elbow Park Residents Association

Corran Hockey
President, Elboya Britannia Community Association

Gary Ursu
President, Forest Heights Community Association

Chris Welner
President, Glendale Community Association

Jeff Marsh
President, Hounsfield Heights, Briar Hill Community Association

Phil Levson
President, Inglewood Community Association

Simone Thumm
President, Lake Bonavista Community Association

Jon Himmens
President, Lakeview Community Association

Kathy Canu
President, Marlborough Park Community Association

Jeff Hyde
President, Mayfair Bel-Aire Community Association

Grant Burchill
President, McKenzie Lake Community Association

Verna Leask
President, Meadowlark Park Community Association

Patsy McNish
President, Mid-Sun Community Association

Chris Best
President, Mount Pleasant Community Association

Lynn McRae
President, Mount Royal Community Association

Lisa Burton
President, North Glenmore Park Community Association

Brian Pedlar
President, Oakridge Community Association

Harris Hanson
President, Palliser, Bayview, Pump Hill Community Association

Jonathon Balkwill
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Richard Gray
President, Parkhill Stanley Park Community Association

Charlene Côté
President, Penbrooke Meadows Community Association

Marjorie Roy
President, Pineridge Community Association

Brian Heritage
President, Queensland Diamond Cove Community Association

Kevin Widenmaier
President Richmond Knob Hill Community Association

Paul Storwick
President, Rideau Roxboro Community Association

Iain Campbell
President, Rosedale Community Association

Matthew Guilherme
President, Rosemont Community Association

Larry Yasman
President, Rundle Community Association

Craig Marceau
President, Rutland Park Community Association

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President, Scarborough Community Association

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Lynn Jobe
President, Shawnee/Evergreen Community Association

Marshall McCarthy
President, Shawnessy Community Association

Wendy Whitehouse
President, Southview Community Association

Elizabeth Murray
Past President, St. Andrews Heights Community Association

Anne Johnson
President, Tuxedo Park Community Association

Patty Auger
President, University Heights Community Association

Bob Benson
President, Varsity Community Association

Dylan Richards
President, West Hillhurst Community Association

Pat Guillemaud
President, Westgate Community Association

Jason Carling
President, Willow Ridge Community Association

Ken Young
Development Director, Windsor Park Community Association

Keith Cartmell
President, Wood Creek Community Association