

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

EXECUTIVE SUMMARY

This Land Use Amendment application proposes the redesignation of a corner parcel from Residential-Contextual Two Dwelling (R-C2) District to Residential – Grade-Oriented Infill (R-CG) District in the community of Richmond. The application is intended to change the designation to allow for a new rowhouse development featuring four units.

An amendment to the Richmond Area Redevelopment Plan (ARP) is required to accommodate the proposed redesignation. The ARP amendment seeks to reclassify this site from the current “Conservation and Infill” typology to “Low Density Residential”.

Administration has received a development permit application DP2017-5627 for a new four (4) unit rowhouse building and corresponding four (4) car garage. This application does not include proposals for secondary suites. The application is currently under review and its approval is contingent upon the adoption of the Local Area Plan and Land Use Bylaw amendment by Council.

PREVIOUS COUNCIL DIRECTION

None.

ADMINISTRATION RECOMMENDATION(S)	2018 February 22
That Calgary Planning Commission recommends APPROVAL of the proposed Policy Amendment and Land Use Amendment	
RECOMMENDATION(S) OF THE CALGARY PLANNING COMMISSION	
That Council hold a Public Hearing on Bylaws 30P2018 and 143D2018; and	
<ol style="list-style-type: none"> 1. ADOPT the proposed amendment to the Richmond Area Redevelopment Plan, in accordance with Administration’s recommendation; and 2. Give three readings to the proposed Bylaw 30P2018. 3. ADOPT the proposed redesignation of 0.06 hectares ± (0.14 acres ±) located at municipal address 2403 - 28 Avenue SW (Plan 4479P, Block 19, Lots 57 and 58) from Residential-Contextual Two Dwelling (R-C2) District to Residential – Grade-Oriented Infill (R-CG) District, in accordance with Administration’s recommendation; and 4. Give three readings to the proposed Bylaw 143D2018. 	

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

REASON(S) FOR RECOMMENDATION:

The proposed Local Area Plan amendment and Land Use amendment are in keeping with the relevant goals and policies of the Municipal Development Plan and serve to accommodate future development that enables a moderate increase in density while maximizing the use of existing infrastructure. Moreover, the proposed redesignation seeks to accommodate a development that meets the City's "Location Criteria for Multi-Residential Infill" as outlined in report to Council PUD2016-0405.

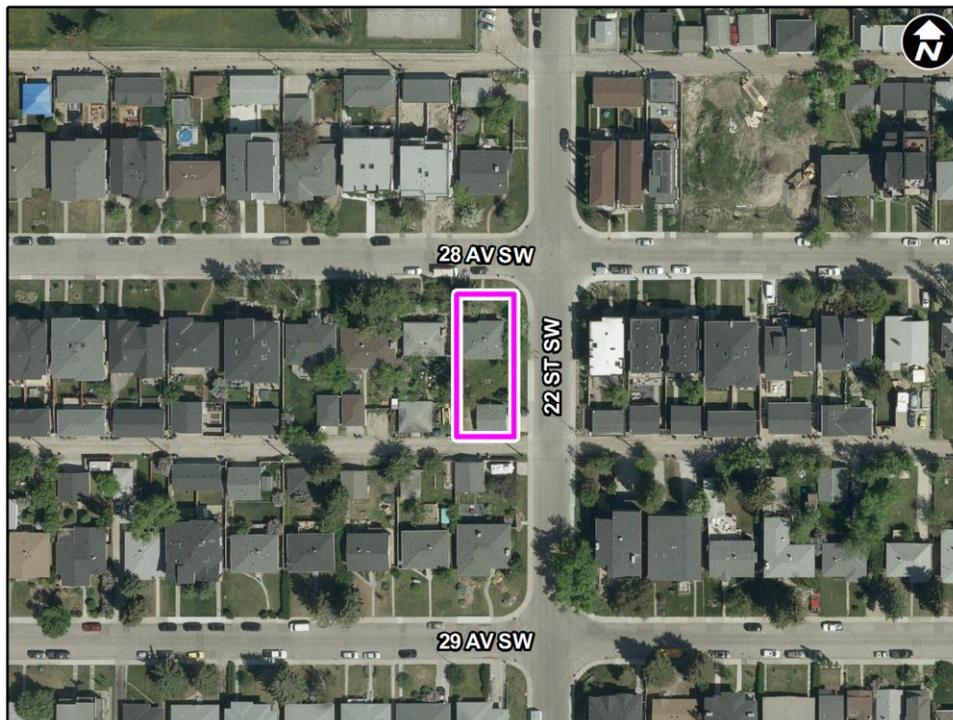
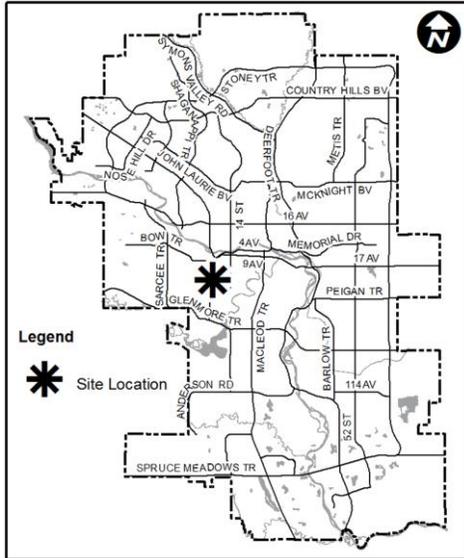
ATTACHMENTS

1. Proposed Bylaw 30P2018
2. Proposed Bylaw 143D2018
3. Public Submissions

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

LOCATION MAPS



POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

ADMINISTRATIONS RECOMMENDATION TO CALGARY PLANNING COMMISSION

1. Recommend that Council **ADOPT**, by bylaw, the proposed amendment to the Richmond Area Redevelopment Plan (APPENDIX II).

Moved by: E. Woolley

Carried: 6 – 0

2. Recommend that Council **ADOPT**, by bylaw, the proposed redesignation of 0.06 hectares ± (0.14 acres ±) located at municipal address 2403 - 28 Avenue SW (Plan 4479P, Block 19, Lots 57 and 58) from Residential-Contextual Two Dwelling (R-C2) District to Residential – Grade-Oriented Infill (R-CG) District.

Moved by: E. Woolley

Carried: 6 – 0

2018 February 22

MOTION:

The Calgary Planning Commission accepted correspondence from:

- Richmond/Knobhill Community Association dated 2018 February 19;

as distributed, and directs it to be included in the report as APPENDIX IV.

Moved by: L. Juan

Carried: 6 – 0

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

Applicant:

Civicworks Planning + Design

Landowner:

South Calgary 24 Ltd

PLANNING EVALUATION

SITE CONTEXT

The subject site is located at the southwest corner of 22 Street SW and 28 Avenue SW, in the community of Richmond. An existing single detached dwelling occupies the site with a back lane providing access to a detached garage. The immediate surrounding area consist entirely of single detached dwellings. The Richmond Elementary School and the Richmond Community Hall buildings along with associated green spaces are located a block to the north. The ARP amendment and redesignation of the subject site is expected to result in a moderate increase to density for the area.

Data from The City of Calgary 2017 Census is provided below showing the peak population and differences between the peak and 2017 population figures.

Richmond	
Peak Population Year	1968
Peak Population	5,080
2017 Population	4,781
Difference in Population (Number)	-299
Difference in Population (Percent)	-6%

LAND USE DISTRICTS

Current Land Use District

The Residential – Contextual Two Dwelling (R-C2) District is intended to accommodate existing residential development in the form of duplex, semi-detached and single detached dwellings in developed areas of the City to a maximum of two units.

Proposed Land Use District

The Residential – Grade-Oriented Infill (R-CG) District is intended to:

- accommodate existing residential development;
- accommodate grade-oriented development in the form of rowhouse, duplex, semi-detached and cottage housing clusters;
- accommodate secondary and backyard suites within new and existing residential development;

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- provide flexible parcel dimensions and building setbacks that facilitate integration of a diversity of grade-oriented housing forms over time; and
- accommodates site and building design that is adaptable to the functional requirements of evolving household needs.

The Residential – Grade Oriented infill (R-CG) District allows for a maximum residential density of 75 units per hectare, and can accommodate infill housing forms that include secondary suites. As per the applicant's submission, no secondary suites are being proposed as part of the proposed 4 unit rowhouse development. The proposed density for this parcel with the four units will be 69 units per hectare – below the maximum of the district.

LEGISLATION & POLICY

South Saskatchewan Regional Plan (SSRP)

This provincial plan establishes a vision for the region using a cumulative effects management approach that requires alignment of local land use decisions with Alberta's long-term economic, environmental and social goals. The proposed redesignation complies with the overall goals of the provincial plan including the Land Use Patterns policies (subsection 8.14).

Municipal Development Plan (MDP)

The site is located within a "Residential Developed – Established Area" on the Urban Structure Map (Map 1) in the *Municipal Development Plan* (MDP). While the MDP makes no specific reference to this site, this land use proposal is consistent with MDP policies including the Developed Residential Areas policies (subsection 3.5.1), the Neighbourhood Infill and Redevelopment policies (subsection 2.2.5) and the Housing Diversity and Choice policies (subsection 2.3.1).

The proposed Residential – Grade-Oriented infill (R-CG) District allows for development that is sensitive to the existing context and conforms to the relevant policies of the MDP. The subject site is located on a corner parcel, and will allow for a greater variety of housing forms in the area. For this reason, the proposed redesignation is found to comply with the general goals of the MDP while providing sound rationale to accommodate the minor amendment to the Richmond Area Redevelopment Plan.

Richmond Area Redevelopment Plan (ARP)

This application was reviewed against the applicable policies of the Richmond Area Redevelopment Plan, being the applicable Local Area Plan. The Land Use Policy map of the ARP identifies the parcel as being "Conservation and Infill." The intent of the Conservation and Infill typology is to improve existing neighbourhood quality and character while permitting low profile infill development that is compatible with the surrounding dwellings.

The redesignation of the parcel to Residential – Grade-Oriented Infill (R-CG) District requires a site specific minor amendment to Map 2, see Appendix II. The ARP amendment to change the classification to "Low Density Residential" ensures alignment with the policy framework. The proposed classification is intended to provide for low profile family-oriented redevelopment that includes multi-dwelling infill projects comprised of townhousing or stacked townhousing.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Location Criteria for Multi-Residential Infill

The “Location Criteria for Multi-Residential Infill” are a set of guidelines that were adopted by Council on 2014 March 31. These guidelines provide measures to assess the appropriateness of multi-residential infill within its immediate context. While the guidelines were intended to be used in the evaluation of proposed M-CG, M-C1 and M-C2 districts, using the same guidelines in evaluating the proposed R-CG district is found to be appropriate for the proposed redesignation. The list of criteria and assessment is summarized in APPENDIX III.

The subject parcel meets five (5) of the eight (8) location criteria for multi-residential infill. The three criteria which the subject parcel does not meet are not deemed to be critical in appropriately accommodating infill residential in the scale that can be accommodated by the proposed redesignation. For such reasons, the redesignation from Residential-Contextual Two Dwelling (R-C2) District to Residential – Grade-Oriented Infill (R-CG) District generally complies with the Location Criteria guidelines.

TRANSPORTATION NETWORKS

Subject parcel is located on a corner lot with vehicular access from the lane. On street parking is available on adjacent streets. Nearest transit stop is 250m from the parcel and is located along 26 Avenue SW (served by Transit Route 6). Additional transit service is available along Crowchild Trail with the South West BRT route also serving the area in the near future. The transit stops on Crowchild Trail SW are almost 300 meters from the parcel.

UTILITIES & SERVICING

Sanitary and stormwater mains are available to service the site. A 150 mm water main and 250 mm sanitary sewer are both available from 28 Avenue SW. No upgrades are required for either.

A 375 millimetre storm sewer line is available off of 22 Street SW. Further comments including allowable release rate will be provided to the developer at the time of development permit review.

ENVIRONMENTAL ISSUES

An Environmental Site Assessment was not required at the time of review.

ENVIRONMENTAL SUSTAINABILITY

Sustainability measures will be evaluated at the Development Permit review stage.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

GROWTH MANAGEMENT

The proposed amendments do not trigger capital infrastructure investment, and therefore there are no growth management concerns at this time.

PUBLIC ENGAGEMENT

Citizen Comments

During Administration's review of the proposed amendments the application was circulated to the adjacent neighbours. Letters from the community and adjacent properties resulted in fourteen (14) letters of opposition. A summary of opposition issues are provided below:

- The proposed application and any subsequent development cannot be supported because it deviates from the community plan and applicable ARP policies for Richmond.
- The proposed 3 storey high development will overshadow adjacent lot(s).
- Proposal to proceed with 4 units and building orientation will lead to more units backing onto the adjacent lot and affect privacy. Also, unclear on how many upper storey windows will overlook into the existing homes.
- The reduced building separation (setbacks) between the proposed redevelopment and adjacent existing dwellings is of concern due to privacy.
- With provisions for Secondary Suites added into the development, it is likely more than 4 dwelling units that will be developed, which will lead to parking shortage and additional traffic in the area amounting to congestion on roadways for local traffic. Traffic in this area is already a problem during peak and school hours introducing more vehicles to the area may compromise safety.
- The popularity of the adjacent Marda Loop commercial areas often leads visitors to this part of the city to "spill over" and park on close by residential streets. The proposed rezoning needs to consider the cumulative impacts from off-site parking and 4 units (or more) being developed.
- The area in general is lacking an overall transportation/traffic/mobility plan to ensure that quality of life for the area is not reduced by piecemeal approval of higher density land uses.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- A proposed increase in density will significantly and adversely affect numerous adjacent residents and will detract from the character of the neighbourhood, which did not anticipate this amount of density to be tagged at the end of a lower density residential block. Should zoning for row housing be allowed in this locale, a terrible precedent will be set; opening the door for considerable additional density not anticipated or supported by community residents.

Community Association Comments

The Richmond/Knob Hill Community Association provided formal comment outlining its opposition to the application, refer to APPENDIX IV. The Community Association comments have been attached to this document for your review. The following reasons were given for the opposition:

- MDP policies encourage the provision of a broader range of affordable housing to all income levels, and strategies to densify should be determined through a community planning process that involves a broader community engagement on where density is appropriate.
- The current land use typology within the applicable ARP identifies the site as “Conservation and Infill”, and the amendment of the ARP map is not supported by the Community Association.
- The site is not located on a collector or higher standard roadway and does not meet several other requirements as outlined in the document titled “Location Criteria for Multi-Residential Infill” set by Council in 2014.

Administration reviewed all comments and concerns raised by area residents and the Community Association and forwarded them on to the applicant to address. In response, the applicant prepared a comprehensive response that addressed all the concerns. Refer to APPENDIX VI for the applicant’s perspective.

Administration’s perspective to the community opposition is informed by Council’s recent direction, found in the policies and objectives of the Municipal Development Plan. Considering the age of the outdated Richmond ARP, Administration’s assessment is that the Local Area Plan policies and direction have not kept up, and misalign with the more recent corporate objectives and priorities around infill redevelopment. Administration is satisfied with the applicant’s response and supports this application, which meets several overarching objectives of the Municipal Development Plan and enables a moderate increase in density while maximizing the use of existing infrastructure.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Applicant-Initiated Public Engagement

The applicants have provided a summary of their public engagement with the community, see APPENDIX V. The applicant used various strategies to communicate its intent to develop the parcel for a four (4) unit rowhouse prior to the submission.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

APPENDIX I

APPLICANT'S SUBMISSION



460 - 5119 Elbow Drive SW P 403 201 5305
Calgary, Alberta T2V 1H2 F 403 201 5344

OCTOBER 30, 2017

City of Calgary
Planning and Building
800 MacLeod Trail SW
Calgary AB T2P 2M5

RE: Land Use Redesignation from R-C2 to R-CG: 2403 - 28 Avenue SW | Lots 57 & 58, Block 19, Plan 4479P

The subject parcel is located in the community of Richmond / Knob Hill and consists of 0.05795 ha of privately owned land. RNDSQL Inc. has retained CivicWorks Planning + Design Inc. to undertake a land use redesignation process to facilitate the construction a four-unit Rowhouse Building with front doors facing 22 Street and 28 Avenue SW. The proposed use is well-suited to the site, given its surrounding context, lot characteristics and location.

In support of the proposed development, this application seeks to amend the existing R-C2 (Residential – Contextual One / Two Dwelling) District to a R-CG (Residential – Grade-Oriented Infill) District. A supporting Minor ARP Amendment to the Richmond ARP will also be required. The site's current R-C2 (Residential – Contextual One / Two Dwelling) District allows for duplex, single and semi-detached dwellings. Secondary suites are permitted and Backyard suites are discretionary, though only on parcels 9m and 13m wide respectively, thus limiting this parcel to two households regardless of configuration.

Like R-C2, the R-CG District is a Low Density Residential District intended for grade oriented development and does not support multi-residential uses. The intent of the R-CG District is to accommodate grade-oriented development in the form of Rowhouse Buildings, Duplex Dwellings, Semi-detached Dwellings and Cottage Housing Clusters, allow Secondary Suites and Backyard Suites with new and existing residential development, provide flexible parcel dimensions and building setbacks that facilitate integration of a diversity of grade-oriented housing over time, and accommodate site and building design that is adaptable to the functional requirements of evolving household needs.

LOCATION CRITERIA FOR MULTI-RESIDENTIAL INFILL

The proposed R-CG land use and associated rowhouse development aligns with many of the City of Calgary location criteria for multi-unit infill development in low density residential areas. The following chart is a summary of the preferred conditions that support multi-unit infill development like rowhousing:

CRITERIA	SITE ALIGNMENT
On a corner parcel	> YES - The site occupies a corner parcel.
Within 400m of a transit stop	> YES - The site is ~225m from a transit stop.
Within 600m of an existing or planned primary transit stop	> YES - The site is ~400m from a primary transit stop / planned Southwest BRT stop.
On a collector or higher standard roadway on at least one frontage	> YES - The site fronts onto a local collector road and is less than 225m from 26 Avenue SW.
Adjacent to existing or planned non-residential development or multi-unit development	> NO - However, the site is proximate to a number of recently built semi-detached developments.
Adjacent to or across from an existing or planned open space, park or community amenity	> YES - The site is located ~125m from Richmond school, and ~325 from Richmond / Knob Hill Community Centre.
Along or in close proximity to an existing or planned corridor or activity centre	> YES - The site fronts onto a local collector road and is within 500m (5-10min walk) of 33 Avenue SW Main Street.
Direct lane access	> YES - The site has direct lane access.

**POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018**

MAP 8C



CITY-WIDE POLICY ALIGNMENT

This proposed development is consistent with the city-wide goals and policies of the Municipal Development Plan, which encourages the development of more housing options in established communities, more efficient use of infrastructure, and more compact built forms in locations with direct and easy access to transit, shopping, schools and other community services.

COMMUNITY ENGAGEMENT

RNDSQR and the project team have designed and undertaken a comprehensive community engagement process in support of this application and others like it to ensure a clear and transparent application process for all stakeholders. Our process is focused on informative and fact-based engagement and communications. The project team is committed to working with our neighbours throughout the application process. Key elements of our engagement strategy include:

On-site Signage | To be installed on-site at time of submission

To supplement the usual City of Calgary notice signage that is associated with Land Use Redesignation and Development Permit Applications, RNDSQR and the project team have designed and custom built on-site signage that notifies neighbours and surrounding community members of a proposed land use change.

The signage outlines RNDSQR's vision for introducing innovative new housing options to Calgary's inner-city communities and directs interested parties to get in touch with the project team. A corresponding project website includes additional site-specific project information and provides answers to commonly asked questions about the proposed land use district and development outcome.



SIGNAGE INSTALLED ON-SITE DURING R-CG APPLICATION PROCESS

HEY NEIGHBOUR!
 An exciting change is happening here!

We are proposing a land use change here to give more Calgarians an opportunity to:

FIND NEW INNER-CITY LIVING OPTIONS
 This is a chance to help grow our community by starting to build more housing options in established communities, more efficient use of infrastructure, and more compact built forms in locations with direct and easy access to transit, shopping, schools and other community services.

HAVE MORE CHOICES FOR GETTING AROUND
 We are proposing a land use change here to give more Calgarians an opportunity to live in a more vibrant, walkable, and transit-oriented community.

FIT WHERE YOU LIVE
 We will be working with you to ensure that the proposed development fits into the existing character of the neighbourhood and meets the needs of the community.

Want to know more or let us know what you think?
 Visit www.engageRNDSQR.com

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C



Project Website | www.engageRNSQR.com

To ensure that all stakeholders have consistent and easy access to information about future RNSQR projects, the project team has developed and launched a website portal for projects that are in the planning and approvals process. The engageRNSQR website portal includes:

- Information about RNSQR and their vision;
- Project-specific pages that include site location, the proposed development vision and associated land use change;
- Answers to frequently asked questions;
- Opportunities to contact the project team with general or site-specific questions and comments; and
- Contact information for The City File Manager, along with LOC & DP reference numbers (once filed and assigned).



**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C



Surrounding Area Postcard Drop | ~100 surrounding area neighbours

Paired with on-site signage, hand delivered postcards are delivered to neighbours on surrounding blocks to ensure that adjacent property owners are aware of the proposed land use change.

The postcards outline RND5QR's vision for introducing innovative new housing options to Calgary's inner-city communities and direct interested parties to get in touch with the project team. A corresponding project website includes additional site-specific information and provides answers to commonly asked questions.

HEY NEIGHBOUR!
An exciting change is happening near you!

We are proposing a land use change at 2403 - 28 Avenue SW to give more Calgarians an opportunity to:

FIND NEW INNER-CITY LIVING OPTIONS
The inner city is our domain. This is where we connect, where we work, and where we play. It is full of amazing talent and we want to help grow our community by giving more Calgarians the opportunity to see what makes inner city living great! For inner city families looking for something different, we build homes that fit in the missing middle - not typical condos or infills. In everything we do, we remain committed to being good neighbours and working with the community where we build. We look forward to working with you to realize our vision!

HAVE MORE CHOICES FOR GETTING AROUND
Over the last 100 years, cities have been shaped by the needs of vehicles. Planning transportation around the automobile has allowed people to live further away from their everyday destinations and give rise to low road cities like today. We want to create homes for those who dread the thought of the daily commute. We choose to build in walkable neighbourhoods with great access to transit, car-sharing services and cycling amenities. We want to give more Calgarians this option - to live in communities where having or using a vehicle is a choice and not a necessity.

FIT WHERE YOU LIVE
It's where you live that's about finding balance. We all want to get more out of our lives, and for some, that means less commuting and more living. It means appreciating that inner-city life is more - a philosophy that embodies connection and sustainable living. At RND5QR, we focus on living, connecting, and creating spaces where people can make it all fit. We build homes for people who understand the joys of walking around the corner for groceries, a fresh coffee, and an amazing local meal. We build for people who love the vibrant mix of the inner city. We also value quality craftsmanship, and believe we can fit that in too.

Want to know more or let us know what you think?
Visit www.engageRND5QR.com

fit where you live.

The inner-city is our domain. This is where we connect, where we work, and where we play. It is full of amazing talent and we want to help grow our community by sharing it with you.

We craft inspired, affordable, modern spaces for people who want to spend less time commuting and more time living. We believe you should love where you live, and we are passionate about the details that make each project unique.

CONCLUSION

The proposed land use will facilitate a development that address the "missing middle" - a form of housing that meets the needs of those looking for inner-city housing options that lie somewhere between a traditional condominium and a single-family home or duplex. For the reasons outlined above, we respectfully request that Administration, Calgary Planning Commission and Council support this application.

Should you have any questions, comments or concerns, please contact me at 403.889.4434 or boris@civicworks.ca.

Sincerely,

Boris Karn, Planner
B.H.Sc., M.Plan.



POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018

MAP 8C

APPENDIX II

PROPOSED AMENDMENT TO THE RICHMOND
 AREA REDEVELOPMENT PLAN

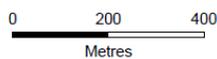
- (a) Delete the existing Map 2 entitled “Land Use Policy” and replace with the revised Map 2 entitled “Land Use Policy”, as follows:

Map 2

Land Use Policy

Legend

- Study Area Boundary
- Main Street Area Developed Areas Guidebook
- Future Comprehensive Plan
- Neighbourhood - Low Rise
- Neighbourhood Limited
- Community Mid Rise
- Conservation/ Infill
- Low Density Residential
- Medium Density Residential
- High Density
- Open Space
- Institutional
- General Commercial
- Local Commercial
- Restricted Local Commercial
- Pedestrian Bridge
- Transition Policy Applies



POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018

MAP 8C

APPENDIX III

LOCATION CRITERIA FOR MULTI-RESIDENTIAL INFILL

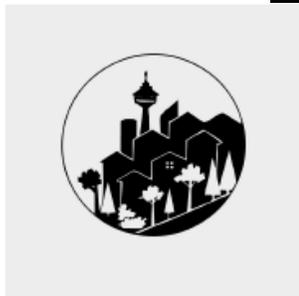
Criteria	Assessment
Located on a Corner Parcel.	Site is located at the southwest corner of 22 Street SW and 28 Avenue SW
Within 400 metres of a transit stop	Site is approximately 225 metres from the nearest transit stop.
Within 600 metres of an existing or planned primary transit stop or station.	Site is approximately 400 metres from the planned South West Bus Rapid Transit line.
On a collector or higher standard roadway on at least one frontage.	The site is not located along a collector roadway.
Adjacent to existing or planned non-residential development or multi-dwelling development.	The site is not adjacent to planned non-residential or multi-unit development.
Adjacent to or across from existing or planned open space or park or community amenity.	Site is not located across an open space or park. However, the site offers easy access for pedestrians to a green space located 125 metres from the site.
Along or in close proximity to an existing or planned corridor or activity centre.	The 33 rd Avenue SW Main Street corridor is approximately 500 metres (5-7 minute walk) from the site.
Direct lane access.	Site has direct lane access.

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

APPENDIX IV

COMMUNITY ASSOCIATION LETTER



Richmond/Knob Hill Community Association

November 29, 2017

Attention: Mr. Fazeel Elahi
Planning & Development
City of Calgary
PO Box 2100 Station M
Calgary AB T2C 1M1

Re: Community Association Comments – LOC2017-0325 – 2403 28 AV SW

We understand that you are the File Manager for the captioned application to change the land use designation of a corner parcel located at 2403 28 Avenue SW (the "Subject Parcel") from R-C2 Residential - Contextual One/Two Dwelling to R-CG Residential - Grade-Oriented Infill, to allow for a 4-unit row house development to be constructed thereon (the "Application"). The Development Committee for the Richmond/Knob Hill Community Association (the "Association") has reviewed the Application and advises that it opposes the Application for the following reasons:

- 1) Although Richmond/Knob Hill ("RKH") falls within the Developed Residential Area – Inner City, being an area in which the Municipal Development Plan ("MDP") generally supports moderate intensification that respects the community context and contributes to a greater variety of housing types overall, and encourages higher residential densities in areas that are well serviced by existing infrastructure, public amenities and transit, it should be noted that the MDP also provides that such intensification is to take place in accordance with Local Area Plans established through community planning processes. In this regard we refer you to:
 - a) MDP Section 2.3.1.b.iii -- Promote a broader range of housing choice for all ages, income groups, family types and lifestyles by including supportive land use policies and development strategies in the Implementation Guidebooks and/or in Local Area Plans that encourage the provision of a broader range of housing affordable to all income levels (emphasis added);
 - b) MDP Section 2.3.1.d -- Promote methods to efficiently use or adapt the city's existing housing stock to enable changing households to remain in the same home or neighbourhood for many years. Strategies may include allowing accessory units in low-density areas and other methods determined through community planning processes (emphasis added); and

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 2 -

- c) MDP Section 2.3.2.d -- 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 transitions with existing neighbourhoods.
- 2) The Local Area Plan applicable to the Subject Parcel is the Richmond Area Redevelopment Plan (the "Richmond ARP"), which provides for the following residential land use policies:
 - a) Conservation and Infill, which allows for single detached dwelling, semi-detached dwelling and duplex developments;
 - b) Low Density, which allows multi-dwelling infill developments, such as townhouses and stacked townhouses, not exceeding 75 units per hectare;
 - c) Medium Density, which allows townhouse, stacked townhouse and apartment developments not exceeding 210 units per hectare; and
 - d) High Density, which includes apartment developments not exceeding 321 units per hectare.

As the Application seeks a redesignation from R-C2 to R-CG to allow the construction of a 4-unit row house development, to be supported by the Richmond ARP the Subject Parcel would need to be located in an area designated as Low Density or Medium Density. However, the Subject Parcel is located in an area designated as Conservation and Infill (see attached ARP map – Attachment 1), and the Application is therefore not supported by the Richmond ARP.

As the Richmond ARP dates back to 1986, and has not been materially updated since then, consideration should be given to whether its designation of the Subject Parcel as Conservation and Infill is still appropriate, or whether a different designation would better address "local character, community needs and appropriate development transitions within" RKH.

- 3) The "Location Criteria for Multi-Residential Infill" implemented by City Council in 2014 set out certain criteria for assessing the appropriateness of applications seeking redesignation to allow multi-residential infill development in a low density area. Those criteria, and their application to the Subject Parcel, are as follows:

Is the Subject Parcel:

- a) A corner parcel – YES, the Subject Parcel is a corner parcel;
- b) Within 400m of a transit stop – YES, the Subject Parcel is located within 400m of transit stops on 26 Avenue SW and Crowchild Trail S;
 - i) In this regard, with transit routes on 17 Avenue SW, 26 Avenue SW, Crowchild Trail S and portions of 33 Avenue SW, it should be noted that there are transit stops within 400m of every low density residential parcel ("LDR Parcel") in RKH (see attached map – Attachment 2;

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 3 -

- c) Within 600m of a transit stop on the Primary Transit Network – YES, the Subject Parcel is within 600m of transit stops on Crowchild Trail S, which is part of the Primary Transit Network;
 - i) In this regard, as 17 Avenue SW, 33 Avenue SW and Crowchild Trail S are all part of the Primary Transit Network, it should be noted that there are Primary Transit Network transit stops within 600m of every LDR Parcel in RKH (see attached map – Attachment 3);
- d) On a collector or higher standard roadway on at least one frontage – NO, the Subject Parcel is not located on a collector or higher standard roadway;
 - i) The Subject Parcel has frontages on 22 Street SW and 28 Avenue SW, neither of which is classified as a collector or higher standard roadway (see attached map – Attachment 4), and the City has even taken steps to reduce traffic on 22 Street SW by installing a NB restrictor at 33 Avenue SW;
 - ii) The only roads within or bordering onto RKH that are classified as collectors are:
 - (1) 19 Street SW north of 19 Avenue SW;
 - (2) 19 Avenue SW (between 24 Street SW and 25A Street SW);
 - (3) 19/20 Avenue SW (between 19 Street SW and Richmond Road SW)
 - (4) 20 Street SW (south of 26 Avenue SW);
 - (5) 24 Street SW (between 17 Avenue SW and Crowchild Trail);
 - (6) 25 Street SW (between 26 Avenue SW and Richmond Road SW);
 - (7) 26 Avenue SW; and
 - (8) Richmond Road SW;
- e) Adjacent to existing or planned non-residential development or multi-unit development – NO, the Subject Site is surrounded by other R-C2 parcels and developments which are consistent with that designation;
- f) Adjacent to or across from an existing or planned open space, park or community amenity – NO, the Subject Site is surrounded by other R-C2 parcels and developments which are consistent with that designation;
- g) Along or in close proximity to an existing or planned corridor or activity centre – NO, the Subject Site is surrounded by other R-C2 parcels and developments which are consistent with that designation, and is 5 blocks away from the nearest neighbourhood corridor, being 33 Avenue SW; and
- h) Served by direct lane access – YES, the Subject Parcel is served by direct lane access
 - i) In this regard, as RKH is a laned community, it should be noted that virtually all of its LDR Parcels are served by direct lane access.

The Subject Parcel therefore satisfies only 4 of the 8 criteria, as would virtually every other corner LDR Parcel in RKH, and 3 of those 4 “satisfied” criteria would be satisfied by virtually every LDR Parcel in RKH. Accordingly, if these results are considered sufficient to conclude that the Subject Parcel is an appropriate location for multi-residential infill development, and therefore that its designation under the Richmond ARP should be upgraded from

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 4 -

Conservation and Infill to Low Density, then that would suggest that every corner LDR Parcel in RKH, and possibly every LDR Parcel in RKH, should be similarly upgraded. If a change is to be made to the Richmond ARP that has the potential to have ramifications of that magnitude, then it should only be done through a comprehensive community engagement process that determines not only the need for such a change, but also widespread community support for such a change, as was recently done to update the Area Redevelopment Plans for the NW communities of Banff Trail and Capitol Hill.

- 4) It is not apparent to the Association that there is either a need to open up RKH's non-collector LDR Parcels, whether corner or interior, to multi-residential infill development, nor widespread community support for such a change. With respect to the issue of need, RKH's population stopped declining back in 1988 and since then has grown by 31%, and is expected to surpass its previous 1968 peak within the next year or two (see attached chart – Attachment 5). Over the same period the number of residential units in RKH has increased by 33%. Much of this increase in population and number of units has taken place within the R-C2 portions of RKH's Conservation and Infill areas, where older wide-lot bungalows have been subdivided and replaced with 2 narrow lot detached or semi-detached infills. Opportunities exist for significantly more population and unit count growth:
- a) Within the Richmond ARP's existing Conservation and Infill areas, as to date only around half of RKH's R-C2 parcels have been redeveloped;
 - b) Within the Richmond ARP's existing Low Density and Medium Density areas, which to date have also only been partially redeveloped;
 - c) Along and in the vicinity of RKH's two "Main Streets", being:
 - i) 17 Avenue SW, the westmost portion of which recently underwent a major Main Streets community engagement process that culminated in City-initiated upzoning, including of R-C2 parcels to R-CG, and amendments to that portion of the Richmond ARP – we anticipate a similar process being initiated for RKH's remaining portion of 17 Avenue SW in the near future; and
 - ii) 33 Avenue SW, for which a new "activity centre" Area Redevelopment Plan was enacted in 2014 and a Main Streets community engagement process is just getting underway, and where over 200 new apartment-style units are either currently under construction or in the planning approval process;
- In this regard, and in anticipation of the City-initiated upzoning that is likely to result from the 33 Avenue SW Main Streets community engagement process, the Association recently responded favourably to an R-C2 to R-CG upzoning application for the corner parcel at 2403 32 Avenue SW, which backs onto a Marda Loop business district property on the north side of 33 Avenue SW (LOC2017-0238);
- d) Along RKH's collector roads, where to date the Association has responded favourably to all applications to upzone LDR Parcels, including:
 - i) in 2014, applications to upzone:

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 5 -

- (1) each of the interior parcel at 2235 26 Avenue SW and the adjacent corner parcel at 2239 26 Avenue SW (both of which are located along the 26 Avenue SW collector road) from R-C2 to M-CG (LOC2014-0096); and
 - (2) the corner parcel at 2104 Richmond Road SW (located at the intersection of the 20 Avenue SW and Richmond Road SW collector roads) from R-C2 to R-CG (LOC2014-0154);
- ii) in 2015, applications to upzone:
- (1) the corner parcel at 2840 25A Street SW (located along the Richmond Road SW collector road) from DC (based on R-2) to M-CG (building height modifier was requested -- LOC2015-0166); and
 - (2) the interior parcel at 2220 26 Avenue SW (located along the 26 Avenue SW collector road) from R-C2 to M-CG (LOC2015-0182); and
- iii) In 2017, applications to upzone:
- (1) the corner parcel at 2803 25 Street SW (located along the 26 Avenue SW collector road) from DC (based on R-2) to R-CG (LOC2017-0125);
 - (2) the corner parcel at 2804 25A Street SW (located along the 26 Avenue SW collector road) from DC (based on R-2) to R-CG (LOC2017-0172); and
 - (3) the interior parcel at 2224 26 Avenue SW (located along the 26 Avenue SW collector road) from R-C2 to M-CG (LOC2017-0252).

In this regard it should be noted that on several occasions the Association has also taken the position that a DP application for a low density development on an R-C2 parcel located along one of RKH's collectors should be denied on the basis that a higher density development would be more appropriate in that location, in one case even going so far as to include that argument in an appeal of an approved DP to the Subdivision and Development Appeal Board (SDAB2017-0017).

- e) On the Viscount Bennett school site, which the Association understands is likely to become available for redevelopment in the near future.

Based on the above, there would appear to be plenty of opportunities for both further population growth and increased "missing middle" development within RKH without having to open up its non-collector LDR Parcels, whether corner or interior, to multi-residential infill development.

- 5) With respect to the issue of community support, based on the feedback that the Association has received from RKH residents over the last few years, including through:
- a) a 2010 community engagement process as part of the development of the Association's Residential Development Design Guidelines, which referenced a willingness to consider upzoning applications for parcels along RKH's collectors/corridors;
 - b) a 2014 Winterfest community engagement event;
 - c) a 2015 Community Visioning project in which the Association partnered with the Federation of Calgary Communities, the University of Calgary Urban Studies group and the Killarney Glengarry Community Association; and

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 6 -

- d) regular interaction with RKH residents both generally and in relation to specific development proposals,

it has become quite clear to the Association that there is reasonably widespread support among RKH residents for further intensification, but only to the extent either contemplated by the Richmond ARP or located along our collectors and Main Streets. We have not detected any groundswell of support for having our non-collector LDR Parcels, whether corner or interior, opened up to multi-residential infill development.

Based on the above, the Association requests that the Application be denied, and that the applicant be encouraged to redevelop the Subject Parcel in accordance with its existing R-C2 land use designation.

Thank you.

Richmond/Knob Hill Community Association
c/o 2126 28 Avenue SW
Calgary AB T2T 1K5
development@richmondknobhill.ca



Dennis Cant
Director, Development



Doug Roberts
Development Committee Chair

Attachments (5)

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

From: Doug Roberts
Sent: Monday, February 19, 2018 6:06 PM
To: Gondek, Jyoti; Cope, Ian; Woolley, Evan V.; Friesen, Colin; Tita, Matthias; Vanderputten, Ryan; Foht, Melvin; Palmiere, Andrew; Juan, Lourdes; Leighton, Douglas; Scott James (PBA Land & Development)
Cc: Elahi, Fazeel; Dennis Cant; Shamir Charania; Dana Hill; Nancy Miller;
president@richmondknobhill.ca; Nicholas Milliken; Chris Harris; Lauren Makar; Ali McMillan
Subject: [EXT] Agenda Item 5.08 -- 2018 February 22 Calgary Planning Commission

TO: Calgary Planning Commission ("CPC")

FR: Richmond/Knob Hill Community Association ("RKHCA")

RE: Agenda Item 5.08
LOC2017-0325
Policy Amendment and Land Use Amendment
Richmond (Ward 8)
2403 28 Avenue SW
22 Street SW and 28 Avenue SW (the "Application")

Upon reviewing Administration's Report to CPC for the captioned item we discovered that the Appendix IV thereto, entitled "Community Association Letter", was incomplete, as it was missing all 5 of the attachments referred to in RKHCA's November 29, 2017 written submission to the File Manager in respect of the Application (the "2017 RKHCA Letter"). A PDF document containing copies of the 5 missing attachments is attached hereto.

In particular, we would like to direct your attention to Attachment 5, a chart that shows historic population and dwelling unit data for the community of Richmond/Knob Hill ("RKH") from 1968 to 2017. This chart tells a much different story than Administration's Report, which simply states that RKH's population in 2017 was down 6% from its peak population year of 1968. As you will see from Attachment 5, the real story of RKH's population is as follows:

1. Over the 20 year period from 1968 to 1988 RKH's population declined by approximately 28% (from 5,080 to 3,656) as the 1950s/60s community matured and children grew up and moved out of their parents' homes — during this period the number of dwelling units in RKH increased slightly from 1,699 to 1,769;
2. Over the 20 year period from 1988 to 2008 RKH's population stabilized and then slowly began to recover, increasing by 6.5% (from 3,656 to 3,892) — during this period the number of dwelling units in RKH increased from 1,769 to 2,112;
3. Over the last 9 years from 2008 to 2017 RKH's population has increased by 23% (from 3,892 to 4,781) — during this period the number of dwelling units in RKH increased from 2,112 to 2,356.

The City of Calgary's 2009 Municipal Development Plan ("MDP") includes policies for managing growth and creating a more compact city. Those policies include:

1. Policy 5.2.2.c. — Endeavour to accommodate 50 per cent of Calgary's future population growth over the next 60 to 70 years within Developed Areas of the city.
2. Policy 5.2.2.d. — Endeavour to accommodate 33 per cent of Calgary's future population growth within Developed Residential Areas of the city by 2039.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Over the last 9 years from 2008 to 2017 the City of Calgary's population increased by 20% (from 1,042,892 to 1,246,337), which would suggest that to meet the MDP's higher 50% population growth accommodation policy the population of a "Residential Developed Area" such as RKH over that same period would need to have increased by at least $(50\% \times 20\% =) 10\%$. As noted above, RKH's population over that period increased by 23%, over double the rate needed to meet the higher 50% MDP policy. If RKH is already densifying at a rate well in excess of what is asked of it under the MDP, then why is there a need for RKH's low density land use districts and Area Redevelopment Plan designations to be amended to allow even greater densification, as proposed by the Application?

We note that Appendix VI to Administration's Report, entitled "Applicant Prepared Response to Community Opposition", is also missing its attachments. One of those missing attachments is a copy of RKHCA's May 25, 2014 letter to Stephen Pearce regarding the proposed R-CG land use district (the "2014 RKHCA Letter"). Page 2 of the applicant's response quotes a portion of the 2014 RKHCA Letter in which the RKHCA indicated that it was generally supportive of the R-CG land use district. The applicant's response then goes on to state that the 2017 RKHCA Letter, in which the RKHCA indicated its opposition to the Application, was "contrary to the previously expressed optimism about the positive potential of the R-CG District". In this regard it is important that CPC members have the opportunity to read the 2014 RKHCA Letter in its entirety, as you will see that it goes on to express a number of concerns regarding the proposed R-CG land use district, including the potential for its introduction to "Lead to 'spot rezoning' of individual parcels, and not necessarily in appropriate areas, but those applications may end up being allowed anyway by a Development Authority that is desperate to see more parcels redesigned as R-CG". We have therefore attached hereto a full copy of the 2014 RKHCA Letter.

As indicated in the 2014 RKHCA Letter, RKHCA does have an interest in increasing the diversity of housing options in RKH, with a view to creating a more complete community with housing options suitable to all stages in life. Rowhouse developments, however, and particularly those with 3-storeys and asking prices starting at \$699,000 per unit as proposed in this case by the applicant, add little to the diversity of housing options in RKH. Many narrow multi-level infill units have already been constructed on RKH's R-C2 parcels, of which older examples tend to be similar in both size and asking price to the applicant's proposed rowhouse units. RKH's remaining bungalows tend to be even more affordable, typically selling for \$600,000 to \$650,000, and offer both large kid-friendly yards and senior-friendly single-level living, neither of which are offered by rowhouse units. RKHCA has accepted new R-CG rowhouse developments in areas of RKH that it considers appropriate for slightly higher-density developments, but it does not consider rowhouse developments to be the solution to RKH's housing diversity issues.

The writer will be in attendance for this item at Thursday's CPC meeting and would welcome the opportunity to answer any questions CPC members may have.

Thank you.

Doug Roberts
Chair, Development Committee
Richmond/Knob Hill Community Association
[REDACTED]
development@richmondknobhill.ca

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C



Richmond/Knob Hill Community Association

May 25, 2014

Stephen Pearce
Land Use Bylaw Sustainment
The City of Calgary

Re: Proposed R-CG Land Use District Rules and Related Land Use Bylaw Amendments

Further to the Richmond/Knob Hill Community Association's (the "RKHCA's") previous submissions regarding the captioned matter, this is to confirm that the RKHCA has reviewed the most recent version of the proposed amendments to the Land Use Bylaw (the "LUB") to introduce the new R-CG land use district (the "R-CG Amendments"), and its comments thereon are as follows.

The RKHCA remains generally supportive of the R-CG Amendments, as they have the potential to create more diversity in housing options for established communities such as Richmond/Knob Hill. Richmond/Knob Hill was originally developed in the 1950s as a bungalow community and its parcels are primarily R-C2, with some R-C1 parcels and even fewer multi-residential parcels. We estimate that our community is approximately 50% redeveloped, and to date that redevelopment has consisted almost exclusively of older bungalows on R-C2 parcels being demolished and replaced with a pair of 2-storey or 3-storey single detached or semi-detached dwelling units. Our concern is that if this development pattern continues Richmond/Knob Hill will end up being a slightly denser but still excessively homogenous residential community, with too little demographic or economic diversity (ie. few rental, starter or senior-friendly housing options). Our window of opportunity to "change our stars" and avoid this result is closing rapidly. The R-CG Amendments may help somewhat, assuming that the remaining concerns we have can be addressed, but our feeling is that we will need much more than that to make an appreciable difference to our community in the little time that we have left before the current window of opportunity closes for another 50 years.

The RKHCA's remaining concerns regarding the R-CG Amendments include the following:

- 1) We do not agree with the intention that "Backyard Dwellings" and "Secondary Suites" no longer be "Dwelling Units" or "units" for the purposes of the LUB, as this has substantive implications, such as for off-street parking requirements, and not just on R-CG parcels;
- 2) Despite this intention, based on our review of the definitions contained in the R-CG Amendments, we believe that "Backyard Dwellings" and "Secondary Suites" do still fall within the definitions of "Dwelling Units" and "units" for the purposes of the LUB, and this will have unintended consequences, including, for example, allowing a semi-detached dwelling development on an R-CG parcel to increase its parcel coverage restriction from 45% to 55% simply by describing each unit's finished basement as a Secondary Suite, as well as raising issues regarding the definitions of

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

- 2 -

various uses such as Contextual Semi-Detached Dwelling, Contextual Single Detached Dwelling, Rowhouse Building, Semi-Detached Dwelling and Single-Detached Dwelling;

- 3) Allowing each main residential unit on an R-CG parcel to have either a Secondary Suite or Backyard Dwelling has the potential to turn a Semi-Detached Dwelling into what is effectively a 4-plex, or a Rowhouse Building into what is effectively a 6-plex, without having to satisfy the additional requirements that actual 4-plexes and 6-plexes are required to satisfy – to help avoid “absentee landlord” issues, we would like to see a requirement added that any such Secondary Suite or Backyard Dwelling can only be occupied by an occupant of the main residential building, by a tenant of such occupant, or by a guest of such occupant or tenant (not unlike the Live Work Unit requirement that only an occupant of the residential portion of the Unit can carry on a business in the business portion of the Unit, which prevents the owner of a Live Work Unit from renting the residential portion to one tenant and the business portion to a different tenant);
- 4) Adding Secondary Suites or Backyard Dwellings to narrow infill parcels will exacerbate an already challenging parking situation, as these narrow parcels are currently required to provide 2 off-street parking stalls for the main residential building and in most cases will be unable to accommodate a 3rd off-street parking stall for the suite, which would suggest that an R-CG land use designation may only be appropriate for parcels located along major transit corridors;
- 5) The City’s stated intention to refrain from initiating any redesignation of parcels in appropriate areas to R-CG, but rather to wait for parcel owners to request redesignation will:
 - a) Significantly lessen and slow the “take up” of the R-CG land use designation;
 - b) Lead to “spot rezoning” of individual parcels, and not necessarily in appropriate areas, but those applications may end up being allowed anyway by a Development Authority that is desperate to see more parcels redesignated as R-CG; and
 - c) Greatly reduce the likelihood of any “zero lot line” Rowhouse Building or Cottage Cluster Housing developments actually being built; and
- 6) It is not clear what types of parcels will be considered for redesignation as R-CG -- if the intention is to generally approve redesignation requests relating to existing R-C2 parcels, regardless of location, and to generally deny redesignation requests relating to existing R-C1 or DC parcels, then we would point out that Richmond/Knob Hill and the other inner-city R-C2 communities are already doing more than their fair share to help the City densify, while inner-city R-C1 and DC communities are currently doing little or nothing in this regard -- these other inner-city communities should be opened up to at least some form of densification before the already densifying R-C2 communities are asked to absorb yet another round of densification through indiscriminate redesignations to R-CG.

Thank you.

Doug Roberts
Director & Chair, Development Committee
Richmond/Knob Hill Community Association
C/o 2126 28 Avenue SW
Calgary AB T2T 1K5

POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018

MAP 8C

Attachment 1



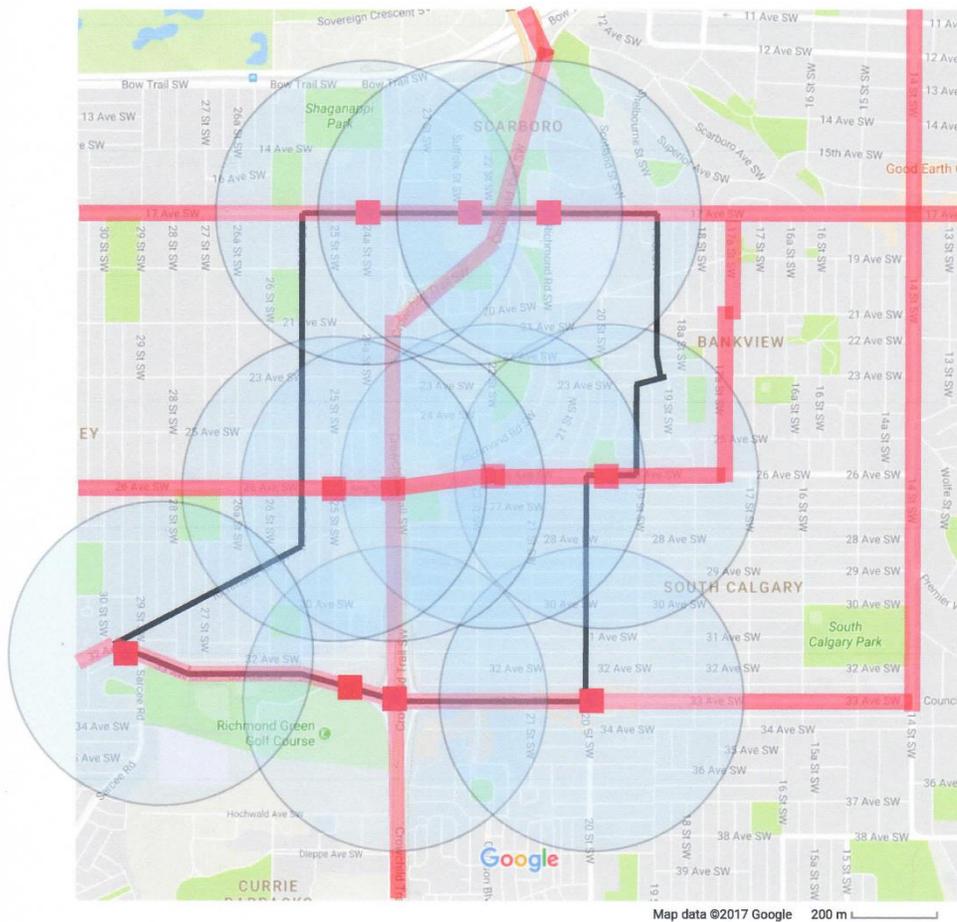
**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

RICHMOND/KNOB HILL

Attachment 2

AREA WITHIN 400M OF TRANSIT STOP



-  Transit Route
-  Transit Stop
-  RKH Community Boundary

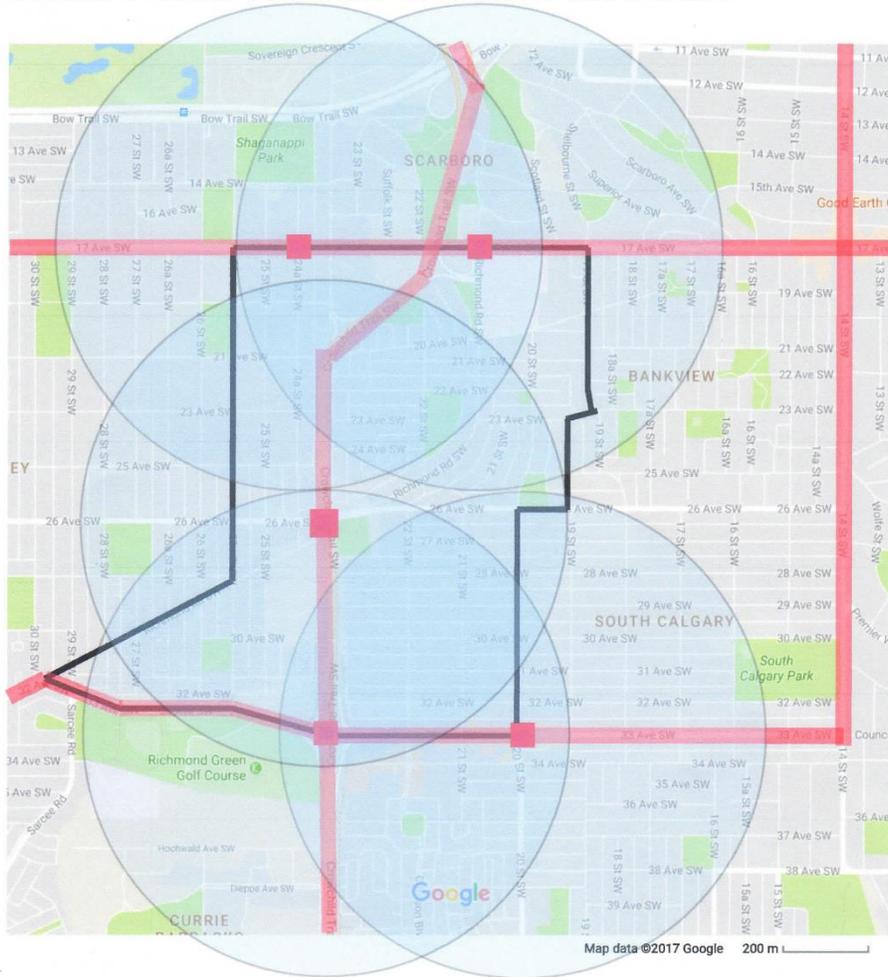
**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

RICHMOND/KNOB HILL

Attachment 3

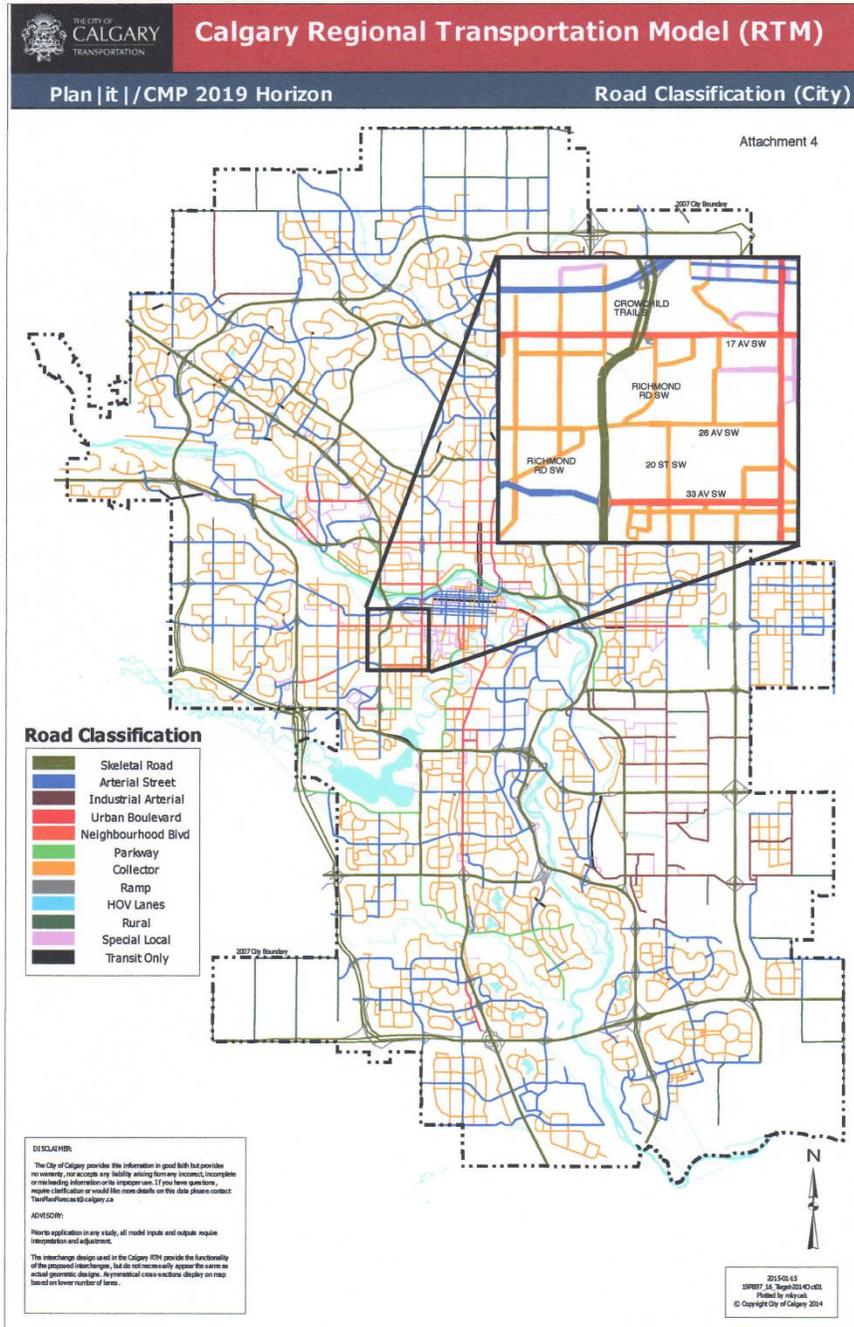
AREA WITHIN 600M OF TRANSIT STOP ON PRIMARY TRANSIT NETWORK



-  Primary Transit Network
-  Transit Stop
-  RKH Community Boundary

POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018

MAP 8C

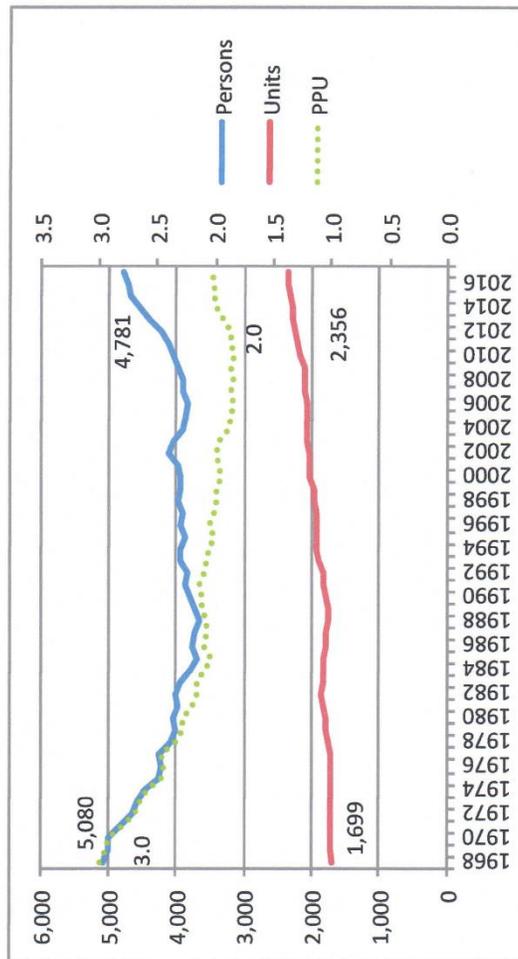


POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018

MAP 8C

Attachment 5

RICHMOND/KNOB HILL Historic Census Data 1968-2017



POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

From: Jessica Karpat <jessica@quantumplace.ca>
Date: January 25, 2018 at 12:35:41 PM MST
To: "Ken.Melanson@calgary.ca",
"ian.cope@calgary.ca"
Subject: [EXT] Fwd: CPC Agenda for Dec 14 LOC2016-0196 (Saddleridge Outline Plan Application)

Hello Planning Commission Members

I apologize for this late email. Item 4.01 before you today is the revised outline plan for Saddle Ridge which is adjacent to my clients parcel of land. The background is included in the email below.

The proposal moving forward without the lane is now satisfactory to my client. Our application should be into The City in the Q1 2018 and we looking forward to working with the City at that time on the concept.

Thank you for your consideration and in helping us to achieve this mutually agreeable solution.

Jessica Karpat
Principal - Planning
403.819.0222

From: Jessica Karpat
Sent: December 5, 2017 2:01 PM
Subject: CPC Agenda for Dec 14 LOC2016-0196 (Saddleridge Outline Plan Application)

Hi Jyoti,

Welcome to office and to CPC as Council's representative!

We represent the landowners of 6827 89 AV NE, the adjacent property to the east of the subject application. QuantumPlace Developments (QPD) is greatly concerned and opposed to the lane proposed at the eastern edge of the subject parcel. The land is fragmented and being developed by multiple land owners. The application will be before CPC for consideration on December 14, 2017. The attached letter outlines our concerns and proposes a win/win solution to address the difficulty that the lane proposed within LOC2016-0196 poses to the parcel to the east (6827 89 AVE NE).

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Of particular concern to this land owner is the feasibility of development adjacent to the lane due to resulting parcel width and a need to ensure CPTED principles are applied to this area.

I will be in touch to make myself available either in person or over the phone for any questions you may have.

Kindly,

Jessica Karpat
Principal - Planning

QuantumPlace Developments Ltd.
Suite 203, 1026 16 Avenue NW Calgary, Alberta T2M 0K6

Phone: +1-587-350-5172
eMail: jessica@quantumplace.ca
Web: www.quantumplace.ca
LinkedIn: Jessica Karpat

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C

APPENDIX V

SUMMARY OF APPLICANT-LED COMMUNITY ENGAGEMENT

COMMUNITY ENGAGEMENT

RNDSQR and the project team have designed and undertaken a comprehensive community engagement process in support of this application and others like it to ensure a clear and transparent application process for all stakeholders. Our process is focused on informative and fact-based engagement and communications. The project team is committed to working with our neighbours throughout the application process. Key elements of our engagement strategy include:

On-site Signage | To be installed on-site at time of submission

To supplement the usual City of Calgary notice signage that is associated with Land Use Redesignation and Development Permit Applications, RNDSQR and the project team have designed and custom built on-site signage that notifies neighbours and surrounding community members of a proposed land use change.

The signage outlines RNDSQR's vision for introducing innovative new housing options to Calgary's inner-city communities and directs interested parties to get in touch with the project team. A corresponding project website includes additional site-specific project information and provides answers to commonly asked questions about the proposed land use district and development outcome.



SIGNAGE INSTALLED ON-SITE DURING R-CG APPLICATION PROCESS

HEY NEIGHBOUR!
An exciting change is happening here!

We are proposing a land use change here to give more Calgarians an opportunity to:

FIND NEW INNER-CITY LIVING OPTIONS
The inner city is our domain. This is where we connect, where we work, and where we play. It is full of amazing talent and we want to help grow our community by sharing it with you.
We want to give more Calgarians the opportunity to see what makes inner city living great! For inner city families looking for something different, we build homes that fit in the missing middle - in other words, not typical condos or infills.
In everything we do, we remain committed to being good neighbours and working with the communities where we build. We look forward to working with you to realize our vision!

HAVE MORE CHOICES FOR GETTING AROUND
For over 100 years, cities have been shaped by the needs of vehicles. Planning transportation around the automobile has allowed people to live further away from their everyday destinations and has given rise to most cities look today.
We want to create homes for those who dread the thought of the daily commute. We choose to build in walkable neighbourhoods, with great access to transit, car sharing services and cycling amenities making our ownership optional for more and more people living in the inner city. We want to give more Calgarians the option to live in communities where having a vehicle is a choice and not a necessity.

FIT WHERE YOU LIVE
"Fit where you live" is about finding balance. We all want to get more out of our lives, and for some, that means less commuting and more living. It means appreciating that sometimes less is more - a philosophy that embodies conscious and sustainable living. At RNDSQR, we focus on living, connecting, and creating spaces where people can make it all fit.
We build homes for people who understand the joys of walking around the corner for groceries, a fresh coffee, and amazing local meals. We build for people who love the vibrant mix of the inner city. And we also value quality craftsmanship, and believe we can fit that in too.

Want to know more or let us know what you think?
Visit www.engageRNDSQR.com

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Project Website | www.engageRNDSSQR.com

To ensure that all stakeholders have consistent and easy access to information about future RNDSSQR projects, the project team has developed and launched a website portal for projects that are in the planning and approvals process. The engageRNDSSQR website portal includes:

- Information about RNDSSQR and their vision;
- Project-specific pages that include site location, the proposed development vision and associated land use change;
- Answers to frequently asked questions;
- Opportunities to contact the project team with general or site-specific questions and comments; and
- Contact information for The City File Manager, along with LOC & DP reference numbers (once filed and assigned).



**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C

Surrounding Area Postcard Drop | ~100 surrounding area neighbours

Paired with on-site signage, hand delivered postcards are delivered to neighbours on surrounding blocks to ensure that adjacent property owners are aware of the proposed land use change.

The postcards outline RND5QR's vision for introducing innovative new housing options to Calgary's inner-city communities and direct interested parties to get in touch with the project team. A corresponding project website includes additional site-specific information and provides answers to commonly asked questions.

HEY NEIGHBOUR!
An exciting change is happening near you!

We are proposing a land use change at 2403 - 28 Avenue SW to give more Calgarians an opportunity to:

- FIND NEW INNER-CITY LIVING OPTIONS**
The inner-city is our domain. This is where we connect, where we work, and where we play. It is full of amazing talent and we want to help grow our community by giving more Calgarians the opportunity to see what makes inner-city living great! For inner-city families looking for something different, we build homes that fit in the missing middle - not typical condos or infills. In everything we do, we remain committed to being good neighbours and working with the communities where we build. We look forward to working with you to realize our vision!
- HAVE MORE CHOICES FOR GETTING AROUND**
Over the last 100 years, cities have been shaped by the needs of vehicles. Planning transportation around the automobile has allowed people to live further away from their everyday destinations and given rise to how most cities look today. We want to create homes for those who dread the thought of the daily commute. We choose to build in walkable neighbourhoods, with great access to transit, car sharing services and cycling amenities. We want to give more Calgarians this option - to live in communities where having or using a vehicle is a choice and not a necessity.
- FIT WHERE YOU LIVE**
"Fit where you live" is about finding balance. We all want to get more out of our lives, and for some, that means less commuting and more living. It means appreciating that sometimes less is more - a philosophy that embodies conscious and sustainable living. At RND5QR, we focus on living, connecting, and creating spaces where people can make it all fit. We build homes for people who understand the joys of walking around the corner for groceries, a fresh coffee, and amazing local meals. We build for people who love the vibrant mix of the inner-city. We also value quality craftsmanship, and believe we can fit that in too.

Want to know more or let us know what you think?
Visit www.engageRND5QR.com

fit where you live.

The inner-city is our domain. This is where we connect, where we work, and where we play. It is full of amazing talent and we want to help grow our community by sharing it with you.

We craft inspired, affordable, modern spaces for people who want to spend less time commuting and more time living. We believe you should love where you live, and we are passionate about the details that make each project unique.

APPENDIX VI

APPLICANT PREPARED RESPONSE TO COMMUNITY OPPOSITION



PLANNING + DESIGN RATIONALE

2403 28 Avenue SW

R-CG Land Use Redesignation (LOC2017-0325)

Development Permit (DP2017-5627)

JANUARY
2018

RNDSQR.ca

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C



202 1680 40 Ave SW OFFICE
Calgary, AB T2T 6T8
403 444 9000 PHONE

RE:

Planning + Design Rationale (LOC2017-0325):

City of Calgary CPAG Detailed Team Review #1 Comments & Richmond / Knob Hill Community Association Correspondence

TO:

Email Delivery:

Mr. Fazeel Elahi | City of Calgary File Manager
Councillor Evan Woolley | Ward 8 Councillor
Mr. Dennis Cant | Richmond / Knob Hill Community Association, Director - Development
Mr. Doug Roberts | Richmond / Knob Hill Community Association, Development Committee Chair

JANUARY 2018

In light of the comments and correspondence received by Administration regarding the appropriateness of the proposed R-CG land use redesignation at 2403 28 Avenue SW (LOC2017-0325), the project team has prepared the below responses, key insights and commentary on the suitability of the R-CG District in developed inner-city communities like Richmond / Knob Hill.

This document aims to address both application-specific concerns, as well as those generally heard about the implementation of the new R-CG District in established inner-city communities where Local Area Plans are no longer aligned with current planning best practices and broader city-wide policies and Bylaws.

ABOUT RNDSQR

RNDSQR is an active, experienced and well-regarded inner-city builder/ developer with multiple holdings and emerging applications in many of Calgary's inner-city communities. RNDSQR is committed to implementing and building on the success of the City's new R-CG District by delivering high-quality, innovative housing options for Calgarians looking for the "missing middle" - affordable and flexible inner-city homes that lie somewhere between a traditional condominium and a single-family home or duplex. We build homes for people who understand the joys of walking around the corner for groceries, a fresh coffee, and amazing local meals. We build for people who love the vibrant mix of the inner-city. We choose to build in walkable inner-city neighbourhoods, with great access to transit, car sharing services and cycling amenities. We want to give more Calgarians this option - to live in communities where having or using a vehicle is a choice and not a necessity. We also value quality craftsmanship, and believe we can fit that in too.

MEETING MDP GOALS: ABOUT THE RESIDENTIAL - GRADE-ORIENTED INFILL DISTRICT (R-CG)

In order to support greater housing choice and reinforce more complete and resilient residential neighbourhoods, the *Municipal Development Plan (MDP)* identifies ground-oriented housing as a key component of complete communities (Policy 2.3.1[a]) and encourages growth and change in low density residential neighbourhoods through the addition of a diverse mix of ground-oriented housing options (Policy 2.2.5[a]). In response to this city-wide policy direction, Administration worked with a wide range of City, community and industry stakeholders to develop and implement the Residential - Grade-Oriented Infill District (R-CG) District.

The R-CG District was specifically designed to facilitate a wide range of low density ground-oriented housing, including rowhouses, semi-detached dwellings, single-family dwellings and secondary suites within Calgary's developed areas. The rules and regulations of the R-CG District are responsive to typical infill conditions and were designed to support the sensitive integration of new and innovative site configurations within existing low density neighbourhoods and facilitate redevelopment that was adaptable to the functional requirements of evolving household needs. The R-CG District also provides communities with more certainty at the Land Use Redesignation stage of redevelopment, since the District rules feature contextual considerations and limit the form and scale of housing, relative to Multi-Residential Districts.

The new District received praise from members of Calgary Planning Commission and was carried unanimously. Following Calgary Planning Commission's recommendation, Council unanimously adopted the District into the Land Use Bylaw in September of 2014.

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C



RNDSQR

Planning + Design Rationale (LOC2017-0325)

ENGAGEMENT AND COMMUNITY ASSOCIATION SUPPORT FOR THE R-CG DISTRICT

In developing the R-CG District, Administration undertook a community engagement process that included meetings held with numerous stakeholders, including Community Associations. Representatives from the following Community Associations attended one or more of these City-hosted meetings: Bankview, Capitol Hill, Chinook Park, Kelvin Grove / Eagle Ridge, Renfrew, Richmond / Knob Hill, Rosedale and Triwood,

Of note, and specific to the community context of the subject application, the Richmond / Knob Hill Community Association's Development Committee submitted a letter of general support for the R-CG District, dated May 25, 2014 (See Appendix 1). The letter begins optimistically, noting the real potential of the R-CG District to have a concrete positive impact on the diversity and availability of housing in the community:

"The RKHCA remains generally supportive of the R-CG Amendments, as they have the potential to create more diversity in housing options for established communities such as Richmond/Knob Hill. Richmond/Knob Hill was originally developed in the 1950s as a bungalow community and its parcels are primarily R-C2, with some R-C1 parcels and even fewer multi-residential parcels. We estimate that our community is approximately 50% redeveloped, and to date that redevelopment has consisted almost exclusively of older bungalows on R-C2 parcels being demolished and replaced with a pair of 2-storey or 3-storey detached or semi-detached dwelling units. Our concern is that if this development pattern continues Richmond/Knob Hill will end up being a slightly denser but still excessively homogeneous residential community, with too little demographic or economic diversity (ie. fewer rental, starter or senior-friendly housing options). Our window of opportunity to "change our stars" and avoid this result is closing rapidly."

RICHMOND / KNOB HILL COMMUNITY ASSOCIATION DEVELOPMENT COMMITTEE CORRESPONDENCE

Contrary to the previously expressed optimism about the positive potential of the R-CG District, the Richmond / Knob Hill Community Association (RKHCA) submitted correspondence dated November 29, 2017 (Appendix 2) to Administration expressing their concern with the subject application. The main thrust of their opposition focused on the following key topic areas:

- Alignment with the Local Area Plan -Richmond Area Redevelopment Plan (1986)
- Location Criteria for Multi-Residential Infill
- Implications of Secondary Suites

With respect to the above areas of concern, RNDSQR and the project team offers the following responses:

Alignment with the Local Area Plan - Richmond Area Redevelopment Plan (1986): As the RKHCA's November 29, 2017 letter (Appendix 2) notes, the subject application seeks to redesignate the subject corner parcel (2403 28 Avenue SW) from R-C2 to R-CG to facilitate the construction of a four unit rowhome. To ensure policy alignment, the project team is also seeking a minor amendment to the *Richmond Area Redevelopment Plan (ARP)*, to change the subject parcel's Policy Area from Conservation / Infill to Low Density.

It is critically important to note that the RKHCA's November 29, 2017 letter (Appendix 2) regarding the subject application states: *"As the Richmond ARP dates back to 1986, and has not been materially updated since then, consideration should be given to whether its designation of the Subject Parcel as Conservation / Infill is still appropriate, or whether a different designation would better address "local character, community need and appropriate development transition within RKH (sic Richmond Knob Hill)."*

This observation highlights a key issue with the relevance of outdated inner-city Local Area Plans like the 32-year old *Richmond ARP* – a Plan with a stated shelf life of 10-15 years, based on the planning goals and principles of the 1979's *Inner City Plan*. Unsurprisingly, Calgary's (and arguably much of North America's) planning realities, policies and goals have drastically changed since these plans were first developed and written. Today, a much greater priority is placed on building complete and resilient communities that make sustainable and efficient use of limited resources like land, energy, infrastructure, services and municipal funding capital. These contemporary realities and their implications are directly reflected in the city-wide policies of the *Municipal Development Plan (MDP)*, the *Calgary Transportation Plan (CTP)* and associated Implementation Plans like the *Developed Areas Guidebook*. Together, these city-wide plans actively facilitate and encourage the development of more innovative and affordable housing options in established communities; more efficient use of services and infrastructure; and more compact built forms in locations with direct and easy access to transit, shopping, schools, amenities, open spaces and other community services.

The goals, policies and priorities of these contemporary city-wide plans are directly reflected in the R-CG District – specifically designed and developed by Administration and eventually adopted by Council to allow more innovative and affordable housing options to reside among and next to other forms of low density residential development within Calgary's developed areas. Given its allowable forms and context sensitive rules, the *Land Use Bylaw* does not consider the R-CG District to be a Multi-Residential use, grouping and categorizing it among other Low Density Residential Districts like R-C1 and R-C2.

This categorization is further reflected by the policies and directions of the *Developed Areas Guidebook (DAG)*, which:

- Translates *MDP* objectives into community level policy.
- Provides general policy to shape more complete communities that are well connected and supported by amenities and services that meet the daily needs of all people.

8

**POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018**

MAP 8C

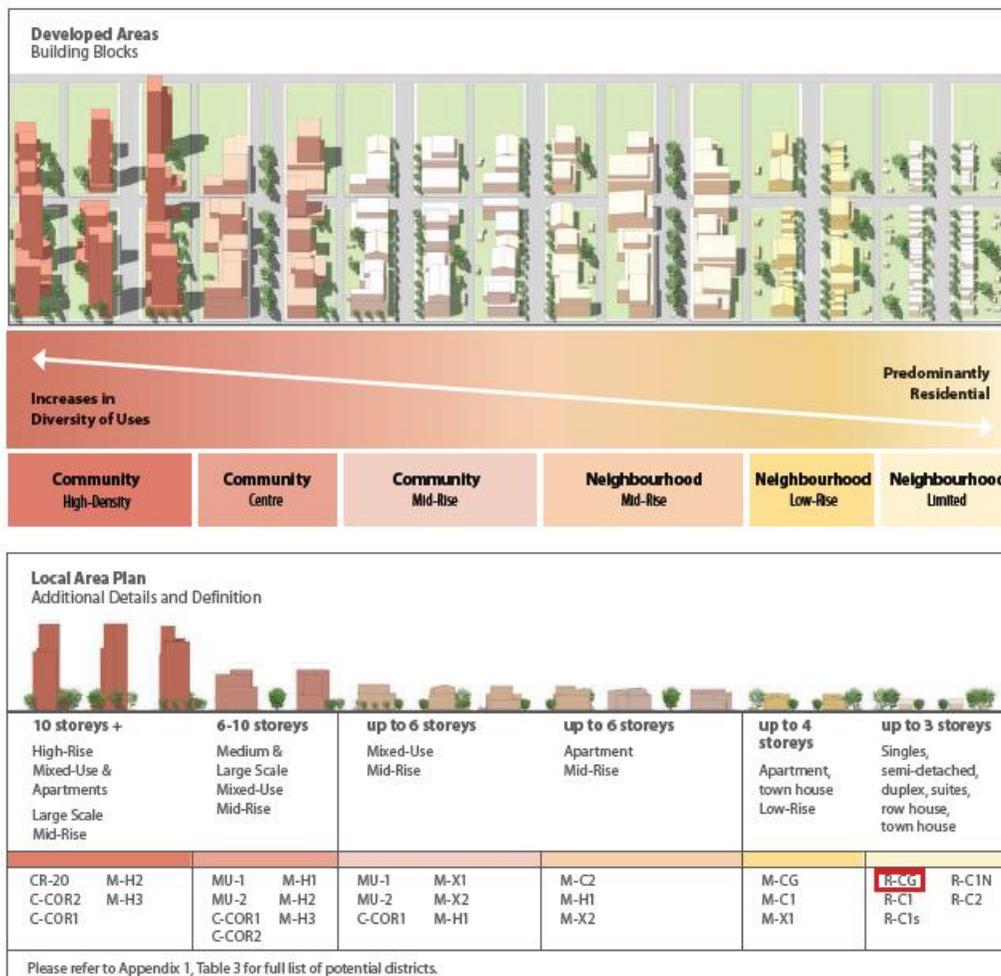


Planning + Design Rationale (LOC2017-0325)

- Provides a common community framework, consisting of land use, urban form and policy direction, for how the Developed Areas are planned and developed today and into the future.
- Establishes a consistent approach for undertaking a Local Area Plan or significant Local Area Plan amendments and implementing the *Land Use Bylaw*.

The DAG provides the following illustrative policy 'Building Blocks' for established communities (Fig.1) – each associated with particular forms and building heights that are typical of specific land use districts. Note that the R-CG District is categorized as 'Neighbourhood Limited' use, among other low density districts like R-C1, R-C1s, R-C1N, and R-C2.

FIG.1 DEVELOPED AREAS: BUILDING BLOCKS
 Source: Developed Areas Guidebook (2017)



POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C



Planning + Design Rationale (LOC2017-0325)

Ultimately, the fundamental misalignment of *Richmond ARP* policy with the R-CG District lies with the ARP's most predominant Residential Policy Area: Conservation / Infill. This Policy Area is directly informed by the goals and policies of the patently outdated *Inner City Plan (1979)* – written in a time of very different planning priorities, values and principles. This is stated directly in the Policy Area purpose statement: “*The conservation policy of the Inner City Plan is reaffirmed through a conservation and infill policy, the intent of which is to improve existing neighbourhood quality and character while permitting low profile infill development that is compatible with surrounding dwellings.*”

Interestingly, the above statement is very similar to the purpose and intent of the Low Density Policy Area, which reads: “*A low density policy is intended to improve existing neighbourhood residential quality and character, as described in the conservation and infill policy, while providing for low profile family-oriented redevelopment. Acceptable redevelopment under the RM-2 district would include single and two-family dwellings and multi-dwelling infill projects comprised of townhousing or stacked townhousing. Maximum density should not exceed 75 units per hectare (30 units per acre).*”

Despite its age, the language and allowable forms/densities of the Low Density Policy Area are far better aligned with current city-wide policy and allow for the sensitive addition of the new and innovative ground-oriented housing options contemplated by the *MDP* and *DAG*. Yet today, the outdated Conservation / Infill Policy Area accounts ~165 acres, or ~8.7% of the total community area zoned for residential uses in Richmond / Knob Hill. By contrast, the far more flexible and relevant Low Density Policy Area accounts for a mere 4.7 acres, or ~2%. Any future evaluation of the *Richmond ARP* and other outdated Local Area Plans should seriously consider the practical policy implications of this imbalance, along with relevance of 1970s-era conservation policy.

As noted above, the proposed development vision, land use redesignation and supporting minor amendment to the *Richmond ARP* are directly aligned with both current city-wide policy and planning best principles. The proposed change also meets the spirit and intent of the *Richmond ARP*, whose residential land use policies seek to improve existing neighbourhood quality and character, provide family-oriented housing options, and allow compatible and sensitive infill development.

Location Criteria for Multi-Residential Infill: In evaluating Land Use Redesignation applications, Administration currently draws on a number location criteria that highlight preferred conditions to support land use amendments in low density residential areas. The *Location Criteria for Multi-Residential Infill* were initially developed and adopted in 2014 to support the Land Use Redesignation application review process for the following Multi-Residential Districts (see Appendix 3):

- Multi-residential – Contextual Grade-Oriented (M-CG) District
- Multi-residential – Contextual Low Profile (M-C1) District
- Multi-residential – Contextual Medium Profile (M-C2) District

As a result of a Motion Arising and subsequent Council direction, Administration would go on to further expand the *Criteria* to include more Districts (including R-CG), be more graphically illustrative, and include supporting rationale and references to *MDP* policy. As part of this process, Administration consulted with a number of stakeholders, including members of Calgary Planning Commission (CPC). It is important to note that even at that time, members of CPC expressed their concern that the guiding criteria “would become the rule and that community members would use the checklist to add up the checks and refuse an application.” The comments outlined in the RKHCA correspondence demonstrate the plausibility of this concern. Given that many inner-city corner lots meet some of the *Location Criteria*, community members feel that “truly appropriate” sites should meet most, if not all of the criteria, regardless of proposed use. This stems from a concern that otherwise, approvals could happen in an indiscriminate way, without due process or the consideration of good planning principles by Administration and the Approving Authority.

The *Criteria* are not (and have never been) intended to be treated as a set of requirements, checklist or scorecard for appropriateness, but rather as an additional tool for Administration to highlight some of the preferred site characteristics that may make a site more suitable for redevelopment. There are no essential *Criteria*, nor is there a specific “appropriateness threshold” for the number of *Criteria* that a site can or must meet. As stated by the *Location Criteria* purpose statement: “*These criteria are meant to be used as a guideline and are to be used in the review and evaluation of land use amendment applications that support multi-residential, rowhouse and cottage housing cluster developments. These criteria are not meant to be applied in an absolute sense to determine whether or not a site should be recommended for approval. In general, the more criteria an application can meet, the more appropriate the site may be considered for multi-residential infill development. In some cases, there may be applications that are appropriate but meet only a few criteria, or may meet multiple criteria but are determined not to be appropriate. These will need to be considered based on the scale and type of development proposed in relation to the local context.*”

A central concern raised by the RKHCA in their correspondence was that the site did not front onto a Collector class road, implying that this was the one key criteria that would make the site appropriate for an R-CG redesignation. Given the modest scale of development proposed – 4 units with 4 private garages and no secondary suites – the resultant traffic generation and parking demand is likely to be minimal. Whether built on a local or collector class road, the distinctly residential form and appearance created by the R-CG District’s steady rhythm of doors and porches adds visual interest to the neighbourhood streetscape, calming local traffic and enhancing pedestrian safety and experience along adjacent sidewalks. Meanwhile, location along a Collector or higher order road may be especially well-suited to higher intensity Multi-residential districts like M-CG, M-C1 and M-C2, which have a higher order of traffic generation and parking demand.

POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018

MAP 8C



Planning + Design Rationale (LOC2017-0325)

Given the breadth of site characteristics covered in the *Criteria*, meeting many or all of the criteria may actually indicate to Administration that a site is especially well-suited for more intense forms of redevelopment – forms typically seen in the Multi-Residential of Mixed Use class of land use districts. Given the modest scale and intensity of change, the R-CG District does not need to meet all of the *Criteria* to be able to sensitively integrate with the existing fabric of low density communities and still achieve the policy goals and directions of the MDP. In the case of 2403 28 Avenue SW, the subject lands provide an opportunity to add innovative and affordable inner-city housing options for Calgarians in a location that benefits from:

Corner Location: The subject site occupies a corner parcel, allowing the proposed development to contribute to the neighbourhood streetscape and reflect existing residential design patterns, with units facing both 28 Avenue and 22 Street SW. Grade-oriented entrances on both streets and building façade articulation provide the appearance of distinct houses, adding to the residential appearance of the street, calming traffic and enhancing pedestrian safety and experience along adjacent sidewalks.

Direct Lane Access: The subject site has direct lane access, facilitating a development that orients vehicle access to the rear lane, creating an uninterrupted, pedestrian-friendly streetscape interface along 28 Avenue and 22 Street SW. Sites with direct lane access minimize the impact of vehicles on adjacent streets and sidewalks, increase parking options with limited impact on the existing neighbourhood, and provide safer, more pedestrian-oriented streetscapes with fewer driveways crossing sidewalks.

Proximity To Primary & Local Transit: The subject site is ~225m from a Local Transit Stop (Route 6), and ~400m from a Primary Transit Stop (Routes 20 & 112), situated along the Crowchild Trail Primary Transit Network corridor. The Primary Transit Network provide communities with daily reliable public transit service, with a frequency of every 10 minutes or less, 15 hours a day, 7 days a week.

Proximity To An Existing Open Space, Park or Community Amenity: The subject site allows future residents direct and easy access to a variety of community resources. The site is only ~65m from an integrated community destination that includes a large park and open space, the Richmond School, the Richmond / Knob Hill Community Association Hall and an outdoor rink.

Proximity to a Main Street: The subject site is ~500m (5-10min walk) from 33 Avenue SW, one of the City-identified Neighbourhood Main Streets – active corridors that attract Calgarians to socialize, work, live, shop, dine, and celebrate. These streets also act as important transportation routes for those who walk, cycle, drive or use transit. City-wide policy encourages both population and job growth around these key corridors.

Implications of Secondary Suites: A critical area of concern for the Richmond / Knob Hill Community Association and surrounding area residents is the uncertainty posed by the inclusion of basement and accessory suites in the permitted uses of the R-CG District. This concern was also heard during the engagement process that informed the development of the District, and continues to be a common theme heard from community members who comment on proposed R-CG land use redesignations. RNDSQR and the project team acknowledge that the uncertainty surrounding secondary suites is a credible concern, since it appears to allow for the proposed unit count to effectively double.

In considering this common concern, it is important to note that to meet building and fire code requirements, secondary suites must be specifically considered and integrated into the architectural design of a rowhome. The inclusion of secondary suites in rowhome buildings requires the inclusion of additional fire prevention measures and fire rated party walls. These requirements cannot be retrofitted into a rowhome building after it has been constructed. This means that a proposed rowhome development with four dwelling units cannot accommodate the future addition of secondary suites. Retrofitting a secondary suite into an existing rowhome is both technically impracticable and cost-prohibitive.

RNDSQR is committed to a transparent and information focused engagement approach that leads to bricks and mortar outcomes. As part of this approach, the team pursues Development Permit applications in step with Land Use Redesignation applications to demonstrate both their development vision and intent. This also ensures that stakeholders have a chance see why a Land Use Redesignation is being sought and the detailed design being proposed.

The proposed development vision does not include any basement or secondary suites, nor does it include the necessary fire prevention/mitigation measures that would allow for the development of suites in the future. This is demonstrated in the detailed design drawings of the associated Development Permit application (DP2017-5627).

COMMON COMMUNITY QUESTIONS & CONCERNS

As part of the Land Use Redesignation application review process, Administration actively informs surrounding area residents of an application having been made and accepts comments from interested citizens and surrounding area neighbours. The File Manager for the subject application received a total of fourteen (14) letters from citizens and neighbours expressing their comments and concerns. The correspondence may have been further encouraged by an anonymous letter distributed by an unknown party to surrounding area residents (Appendix 4). The below provides a response to the key community questions, comments and concerns:

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C



Planning + Design Rationale (LOC2017-0325)

Application & Approvals Process: RND SQR is committed to a transparent and information focused engagement approach that leads to bricks and mortar outcomes. As part of this approach, the team pursues Development Permit applications in step with Land Use applications to demonstrate both their development vision and intent. This also ensures that stakeholders have a chance see why a Land Use Redesignation is being sought and the detailed design being proposed. Appendix 5 provides a photo-realistic visualization of the proposed design, as outlined by the project team's Development Permit application (DP2017-5627).

RND SQR and the project team place great importance on being a good neighbour and working with surrounding community members and stakeholders throughout the application process. As part of that commitment, RND SQR and the project team have designed and undertaken a comprehensive community engagement process in support of this application and others like it to ensure a clear and transparent application process for all stakeholders. Stakeholders like the Community Association and Ward Councillor's office are actively invited to participate in our process, which focuses on informative and fact-based engagement and communications.

Deviation from the Local Area Plan: Please refer to the previously provided commentary on the challenges of older Local Area Plans like the *Richmond Area Redevelopment Plan (ARP)*.

Height & Shadow Concerns: The rules of the R-CG District have been designed to be sensitive to surrounding area context and adjacent landowners. Height rules for Rowhouse buildings allow up to an 11m height in the middle of a building, but maintain contextual height rules for parts of the building directly adjacent to other low density districts. Regardless of building form, the R-CG District limits the maximum height within 4.2 metres of the adjacent property line to 8.6 metres, similarly to other Contextual Districts that have rules governing the relationship to adjacent properties. Furthermore, any floor above 8.6 metres must be reduced by 25% to prevent the building from being large and imposing. As a result, the maximum 11m height for a rowhome is typically only achieved at a building's roof peak. District rules for building coverage and amenity space also ensure that appropriate yard space is still provided.

Prior to the rules of the R-CG District coming into effect, rowhouse forms built in Calgary tended to be large and blocky, having been built under the rules of the M-C1 District. The R-CG District was created specifically to prevent such uniform massing and be contextually similar to other 2 and 3-storey forms allowed by low density districts like R-C2.

Privacy: R-CG rules dictate that rooftop amenity spaces located on the top storey must be oriented towards the street, in order to minimize potential overlooking and privacy concerns. All outdoor amenity spaces and the glazing of all units has been designed, sized and oriented to minimize potential overlooking and privacy concerns. When compared with allowable R-C2 semi-detached building forms, R-CG built forms do not result in additional overlooking or material compromises in privacy for adjacent landowners.

Setbacks: The setback, site coverage, amenity space and height rules of the R-CG District all culminate to orient built form towards the street and away from adjacent neighbouring properties, resulting in more substantial side setbacks than seen in typical R-C2 detached or semi-detached development scenarios. Additionally, Administration generally encourage applicants to seek a reduced front setback to move buildings towards the corner and away from neighbours.

Secondary Suites: Please refer to the previously provided commentary regarding the building and fire code requirements for including secondary or accessory suites in new R-CG rowhomes, as well as the feasibility of adding or retrofitting accessory suites into built R-CG rowhouse forms.

Traffic & Parking: Given current trends toward decreased car ownership in the inner-city and the modest scale of development proposed – 4 units with 4 private garages and no potential for secondary suites – the resultant traffic generation and additional parking demand will be minimal and unlikely to have a material detrimental effect on local traffic or the supply of on-street parking in the neighbourhood. The distinctly residential appearance created by the R-CG District's steady rhythm of doors and porches adds visual interest to the neighbourhood streetscape, calming local traffic and enhancing pedestrian safety and experience along adjacent sidewalks. Today, the lack of on-street parking restrictions in the neighbourhood indicates a healthy and readily available on-street parking supply. Should this change in the future, residents can choose to apply to the Calgary Parking Authority to implement on-street parking restrictions and permits, given sufficient neighbour support.

RND SQR specifically chooses to build in walkable inner-city neighbourhoods, with excellent access to transit, car sharing services and cycling amenities. This gives future residents multiple mobility options and further reduces the potential traffic impacts associated with new development. Those looking for more attainable housing options in inner-city communities are also less likely to opt for multiple vehicle ownership, given the additional costs and considerations associated with car ownership and maintenance.

**POLICY AMENDMENT AND LAND USE AMENDMENT
 RICHMOND (WARD 8)
 2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
 BYLAWS 30P2018 AND 143D2018**

MAP 8C



Planning + Design Rationale (LOC2017-0325)

Density & Neighbourhood Character: RND SQ R is committed to creating homes that are considerate of their surrounding context, offer a high standard of architectural quality and contribute to the fabric of inner-city neighbourhoods. The proposed land use change and associated development vision represent a modest increase in density, while introducing more flexible and affordable inner-city housing options for Calgarians looking to live in communities with direct and easy access to transit, shopping, schools, amenities, open spaces and other community services.

Today, available forms of housing in Calgary's inner-city communities can be prohibitively expensive for young professional and families. The gap in the affordability of detached and semi-detached housing in inner-city communities like Richmond / Knob Hill is highlighted by the most recent City Centre statistics from CBRE (Fig.2 & 3).

FIG.2 CBRE® CITY CENTRE HOUSING BENCHMARK PRICE STATISTICS
 Source: CREB Monthly Statistics Package - City of Calgary (December 2017)

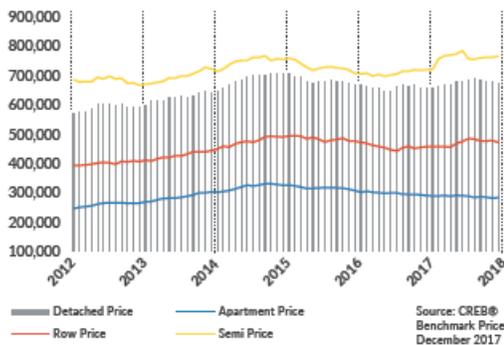


FIG.3 CBRE® CITY CENTRE STATISTICS AREA
 Source: CREB Monthly Statistics Package - City of Calgary (December 2017)



The historic data shows that semi-detached housing prices in particular have continued to climb, making newly built duplexes some of the most expensive housing options available. The benchmark price for an inner-city duplex is now roughly ~\$750,000, putting this housing option out of reach of many families and households who value inner-city living. With a far more affordable benchmark price of ~\$450,000, inner-city rowhomes address the crucial "missing middle" of housing in Calgary- attainable homes that meets the needs of those looking for inner-city housing options that lie somewhere between a traditional condominium and a single-family home or duplex.

Given the diverse range of neighbourhoods represented by the City Centre statistics data, the benchmark housing prices will naturally vary by community. However, the significant affordability gap between the cost of a detached or semi-detached home as compared to a rowhome remains constant. For example, the 2017 MLS sold statistics for Richmond / Knob Hill show that the average sold price for a semi-detached home was ~\$912,000, while the average rowhome sold for ~\$553,000 – a dramatic gap, especially considering the upcoming mortgage rule changes and recent interest rate hikes that will make the costs of home ownership even more challenging for those looking to live in Calgary's inner-city.

The risk of simply maintaining the land use status quo is highlighted in RKHCA's letter of support for the R-CG District, dated May 25, 2014 (Appendix 1): "We estimate that our community is approximately 50% redeveloped, and to date that redevelopment has consisted almost exclusively of older bungalows on R-C2 parcels being demolished and replaced with a pair of 2-storey or 3-storey detached or semi-detached dwelling units. Our concern is that if this development pattern continues Richmond/ Knob Hill will end up being a slightly denser but still excessively homogeneous residential community, with too little demographic or economic diversity (ie. fewer rental, starter or senior-friendly housing options)."

The sensitive addition of rowhomes to neighbourhoods like Richmond / Knob Hill represents a vital opportunity to contribute to the evolving character of Calgary's inner-city and foster complete, resilient and vibrant communities that welcome a diversity of Calgarians.

**POLICY AMENDMENT AND LAND USE AMENDMENT
RICHMOND (WARD 8)
2403 28 AVENUE SW, 22 STREET SW AND 28 AVENUE SW
BYLAWS 30P2018 AND 143D2018**

MAP 8C



Planning + Design Rationale (LOC2017-0325)

CONCLUSION

The proposed land use redesignation at 2403 28 Avenue SW will contribute to the continued vitality of Calgary's inner-city neighbourhoods and facilitate a development vision that addresses the "missing middle" - a form of housing that meets the needs of those looking for inner-city housing options that lie somewhere between a traditional condominium and a single-family home or duplex. For the reasons outlined above, we respectfully request that Administration, Calgary Planning Commission and Council support this application.