

## Applicant's Response to Richmond/Knob Hill Community Association and Community Citizen Comments



### Land use re-designation LOC2018-0007 2040 – 25a Street SW

#### The property:

We are proposing to rezone this property to R-CG – residential – grade-oriented infill district for purposes of building a 4-unit rowhouse with detached 4-car garage. This type of development already exists in the neighborhood and, as such, we believe that the building type is suitable for this property. The units will be two storeys high, which is the same allowable height as any single family or duplex dwelling. Each unit will have direct access from the sidewalk and feature front patios and landscaping which is street-oriented.

#### CPC key points:

CPC recommends approval of the proposed Policy Amendment and Land Use Amendment

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 enable a moderate increase in density while maximizing the use of existing infrastructure. Moreover, the proposed re-designation seeks to accommodate a development that meets the City's "Location Criteria for Multi-Residential Infill" as outlined in the report to council PUD2016-0405.

#### Legislation and policy:

##### South Saskatchewan Regional Plan (SSRP)

The proposed re-designation complies with the overall goals of the provincial plan including the Land Use Patterns policies (subsection 8.14).

##### Municipal Development Plan (MDP)

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 3.2.1).

The proposed R-CG District allows for development that is sensitive to the existing context and conform 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. The proposed re-designation is found to comply with the general goals of the MDP.

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### Richmond Area Redevelopment Plan (ARP)

The re-designation of the parcel to R-CG requires a site specific minor amendment from "Conservation and Infill" to "Low Density Residential". This allows for townhouse development.

### Location Criteria for Multi-Residential Infill

The subject parcel meets 5 of the 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 (see comments further below)

### Transportation networks:

The subject parcel is a corner lot, lane accessible, with street parking available on adjacent streets. The nearest transit stop is 250 m from the parcel, additional transit is available along Crowchild Trail and the SW BRT route.

### Utilities and servicing:

There are no upgrades of existing services required for this development.

### Also:

R-CG is not a multi-family designation – it is a low-density grade-oriented development, designed to integrate into the existing fabric and allow alternative forms of housing for various incomes – the "missing middle".

This proposed development is consistent with 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 existing infrastructure, and more compact built forms in locations with direct and easy access to transit, shopping, schools and other community services.

### **Responses to community citizen concerns:**

1. Deviates from applicable Richmond ARP:  
it is consistent with the intent of the ARP and follows the more recent MDP
2. Infrastructure capacity for the area:  
DTR comments indicate no utility upgrades required
3. Does not fit (with) the existing context (detached/semi-detached) and create(s) over density:

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Zoning allows for 2 units on this site - we are proposing 4. The overall height will be 2 storeys – the same as allowed contextually, except site coverage is up from 45% to 60%. This is not a big jump in density compared to multi-family type developments. There is no provision for future secondary suites. Density is the same as a semi-detached with secondary suites.

4. On-street parking problems may worsen with multi-residential units proposed:  
The City transportation department is not concerned with this issue, present neighborhood does not require on-street parking permits.

5. More cars parking close to the corner and will reduce visibility for pedestrians:  
Studies show that increases in on-street parking, especially at corners, act as traffic calming – cars slow down.

6. Additional one meter in height and amount of sunlight that would block all surrounding neighbors:  
Height limits for rowhouses are potentially 11.0 m. Our proposal is two storey only – the same as the neighborhood context.

7. Concerns around the increase in traffic directly next to a party within a playground zone:  
There will be 2 additional cars for 2 additional units; this would be the same if we built a duplex with secondary suites. Traffic issues only arise with multi-family developments – increases of 10 or more vehicles.

8. Located directly across from a park/playground and increased density will dramatically increase traffic congestion and endanger the park users:  
Two extra cars are not allot (see comments above); also increasing density next to a park increases the usage of the park and make the proposed units more desirable for young families; it is one of the location criteria for increased density

9. Building orientation will affect the privacy of surrounding neighbors:  
Again, this is a two storey building – the same as any house. Building code and land-use bylaw limitations on windows on side elevations, in this case, will reduce the north elevation windows facing the neighbor. The east unit adjacent to the neighbors back yard will have major windows facing east (own back yard) and south as per the other units.

10. Rowhouse development should be towards 17<sup>th</sup> ave SW and Crowchild Trail and 33 ave. SW:  
We acknowledge that greater density should be along major collectors. This development is a minor increase in density and blends in with the context.

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11. Proposed increase in density will significantly and adversely affect numerous adjacent residents and will detract from the character of the neighbourhood, which will not anticipate this amount of density to be tagged at the end of a low density residential block. . . a terrible precedent will be set . . .

The city is totally in favour of increased density in inner city neighborhoods – planning policy dated back to 2014 has been public. This development represents a slight increase in density, The precedent is for lots at block ends only, the advantages are higher population with more activity in area, better utilization of local retail, existing infrastructure. Two storey building with multiple frontages engages the street and makes block end more dynamic and active.

### Responses to RKHCA concerns:

1. MDP policies encourage the provision for a broader range of affordable housing. To meet MDP goals, a grade-oriented R-CG district was introduced in 2014 to facilitate a wide range of low density ground-oriented housing, sensitive integration, provide communities with certainty regarding form and scale of housing. R-CG is one of the low density zoning options (not multi-family).

The ARP was written in 1986 and had a stated shelf life of 10-15 years. Today, much there is greater priority on the more recent MDP, the CTP Calgary Transportation Plan and the Developed Areas Guidebook. The Richmond ARP is directly informed by the Inner-City Plan from 1979. Although this plan is outdated, the goals are similar “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 . . . maximum density should not exceed 75 per hectare.

The community has been engaged at the beginning of this development process, corresponding with a request for re-zoning. Letters were distributed to neighbors outlining our intent.

2. An amendment in the ARP from “conservation and fill” to low-density is not supported by the community association. The city planning department, however, does support this change.

3. The “Location criteria for Multi-residential infill” implemented by the City council in 2014 to assess the appropriateness of of multi-residential infill development in low density areas are as follows:

A – corner parcel – yes

B – within 400m of transit stop – yes

C – within 600m of a transit stop on the primary transit network – yes

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**D – on a collector or higher standard road – no** (see below)

**E – adjacent to existing or planned non-residential development or multi-unit development – no**

F - adjacent to or across from an existing or planned open space, park or community amenity – yes

G – **along, or in close proximity to, an existing or planned corridor or activity centre – no**, subject parcel is, however, close to 19<sup>th</sup> avenue.

H – served by direct lane access – yes

Regarding item D: There is widespread support for further intensification but only to the extent either contemplated by the ARP or located along collector roadways and Main Streets. The subject parcel does not front on a collector road: the resultant traffic generation and parking demand is likely to be minimal. 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.

Location criteria are not 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 characteristic that may make a site more suitable for redevelopment.

4. Potential precedent of increasing density for every corner lot in the entire neighborhood – this is not acceptable, also would require comprehensive community engagement process. There is precedent for increased density along community edges and collector roads (encouraged by community), no need to increase density within the community:

As stated above, this land-use re-designation is considered low-density. There is a minor increase in lot density which is the same as would be allowed for a semi-detached (duplex) dwelling with secondary suites.

### Further points:

5. The subject site benefits from a corner location, direct lane access, proximity to primary and local transit, proximity to an existing open space, park or community amenity, and proximity to a main street

6. Regarding height and shadow concerns: the proposed building is two storeys with pitched roof, the same as allowed in existing R-C1 or R-C2 zoning.

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7. Setbacks: the land-use bylaw allows for and encourages moving buildings towards the corner and away from neighboring property – deducing privacy concerns.

8. Secondary suites: are not part of this proposal; are not possible in the future without expensive renovations due to building code limitations, and new Development Permit application.

9. Traffic and parking: this proposal is for 4 units with 4 private garages and one visitors stall – increases of traffic and parking requirements on local streets is minimal. There are no current parking restrictions, so available parking is not a problem.

10. Density and neighbourhood character: the proposal presents a modest increase in density, while providing 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 community services.

### Conclusion:

The risk of simply maintaining the land-use status quo is highlighted in RKHCA's letter of support for the R-CG district:

"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 – fewer rental, starter or senior-friendly housing options."

The proposed land use re-designation at 2040-25a street 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.

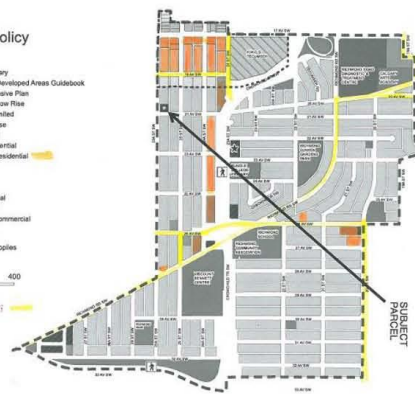
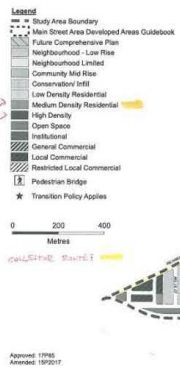
Regards  
Max Tayefi,

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Land use Map

Map 2  
Land Use Policy



Attachment 1

Proposal massing

