

Richmond/Knob Hill Community Association Comments



Richmond/Knob Hill Community Association

February 15, 2018

Attention: Ms. Yuping Wang
Planning & Development
City of Calgary
PO Box 2100 Station M
Calgary AB T2C 1M2

Re: Community Association Comments – LOC2018-0007 – 2040 25A ST 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 2040 25A Street SW (the "Subject Parcel") from DC Direct Control (based on R-2) 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

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- 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 DC (based on R-2) 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 17 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;

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- c) Within 600m of a transit stop on the Primary Transit Network – YES, the Subject Parcel is within 600m of transit stops on 17 Avenue SW and Crowchild Trail S, both of which are 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 25A Street SW and 21 Avenue SW, neither of which is classified as a collector or higher standard roadway (see attached map – Attachment 4);
 - 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 DC (based on R-2) 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 – YES, the Subject Site is across the street from a community park, but is otherwise surrounded by other DC (based on R-2) 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 DC (based on R-2) parcels and developments which are consistent with that designation, and is 2 blocks away from the nearest neighbourhood corridor, being 17 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 5 of the 8 criteria, and 4 of those 5 “satisfied” criteria would be satisfied by virtually every other corner LDR Parcel in RKH, and 3 of those 5 “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

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the Richmond ARP should be upgraded from 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 DC (based on R-2)/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 many DC (based on R-2)/R-C2 parcels to R-CG (including several parcels at the north end of the block face upon which the Subject Parcel is located), 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);

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- 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:
 - (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;

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- 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
- 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 DC (based on R-2) land use designation.

Thank you.

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Dennis Cant
Director, Development

Doug Roberts
Development Committee Chair

Attachments (5)

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Attachment 1

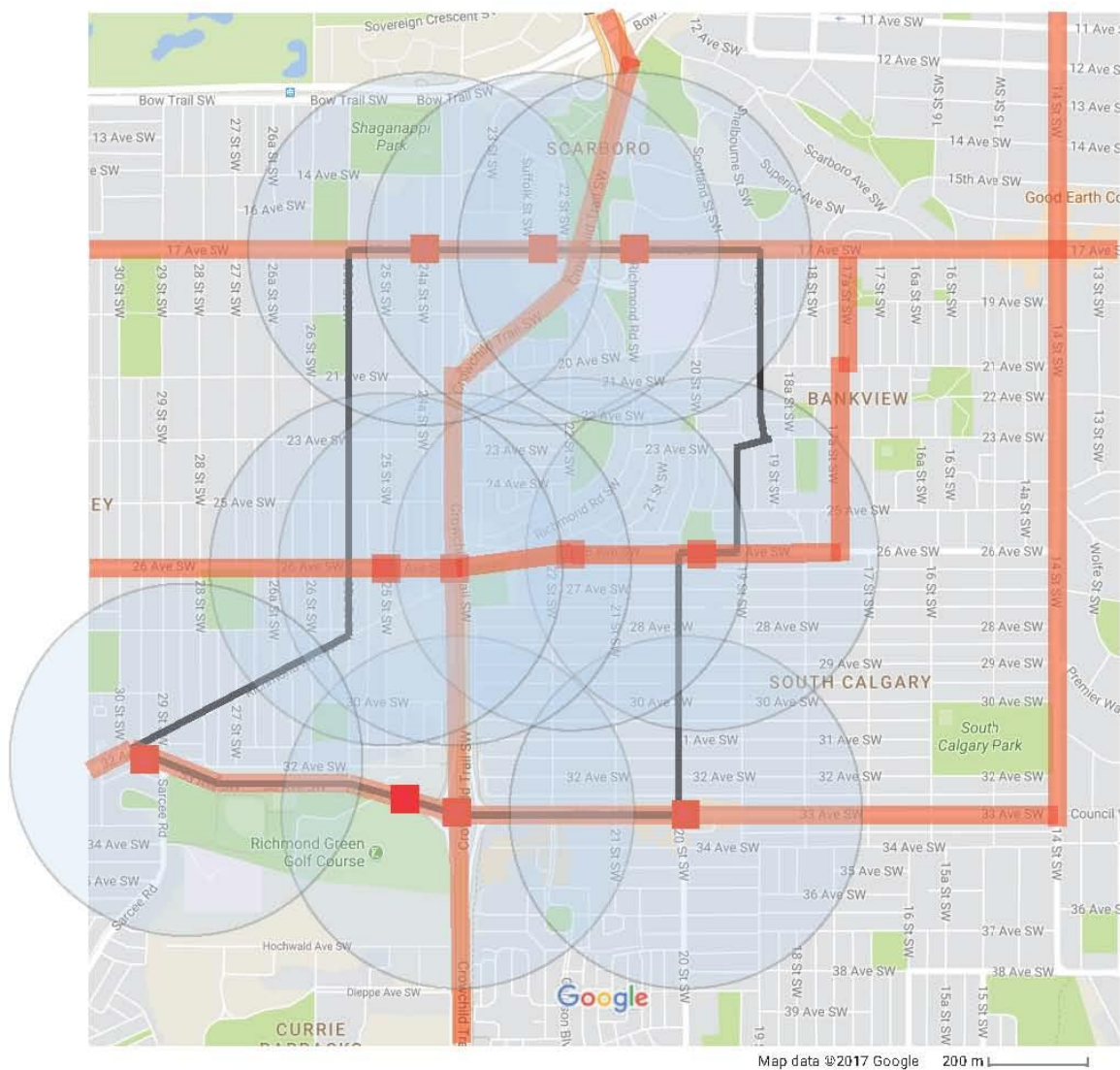


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Attachment 2

AREA WITHIN 400M OF TRANSIT STOP



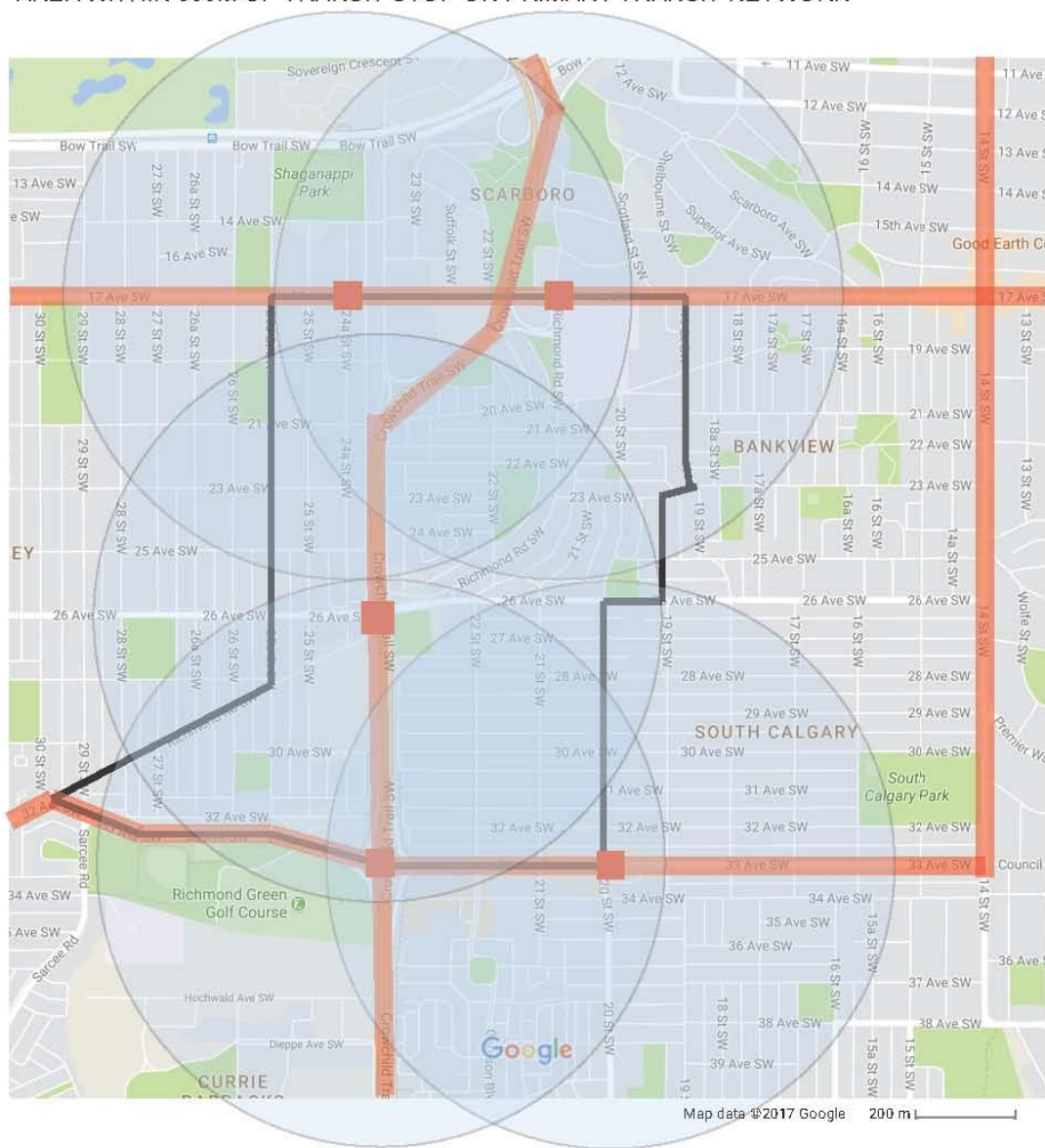
- Transit Route
- Transit Stop
- RKH Community Boundary

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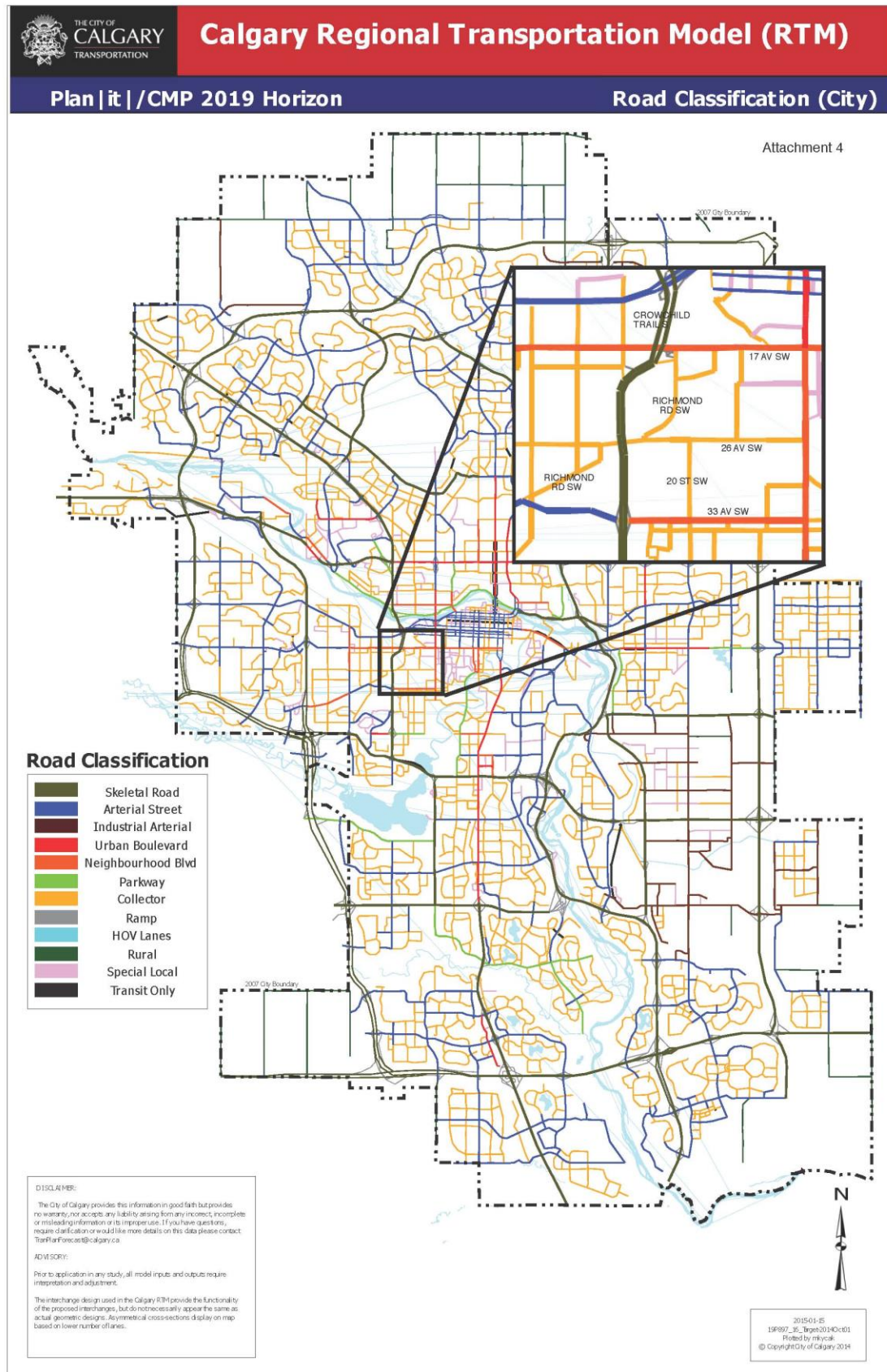
Attachment 3

AREA WITHIN 600M OF TRANSIT STOP ON PRIMARY TRANSIT NETWORK



- Primary Transit Network
- Transit Stop
- RKH Community Boundary

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Attachment 5

RICHMOND/KNOB HILL Historic Census Data 1968-2017

