



July 25, 2018

Calgary Planning Commission  
The City of Calgary  
PO Box 2100, Station M  
Calgary, AB T2P 2M5



Dear Members of Calgary Planning Commission:

**Re: CPC 2018-0883, Enabling Successful Rowhouse Development in the R-CG District**

Regarding the above noted Report, BILD Calgary Region (BILD) would like to acknowledge Administration for bringing together industry and community stakeholders in discussions related to the R-CG District. We appreciate the opportunity to participate in these conversations and share with Administration the input and feedback of our members. In particular, we would like to recognize Stephen Pearce for his efforts in this regard.

The R-CG District is of great importance to our members and to the City's intent to move toward achieving the goals and objectives of the Municipal Development Plan, particularly in relation to the redevelopment objectives of the Plan. Commonly referred to as the 'missing middle', this district supports a built form growing in popularity for facilitating sensitively increased density in established areas at a potentially more affordable price point. It is for this reason that we emphasize that 'getting it right' is critical.

As desirable as the district may be, there are complexities related to it and there are unique challenges between corner R-CG product and mid-block R-CG row housing, that may require different approaches. Some industry stakeholders have expressed concern regarding mid-block development and policy implementation for same. Accordingly, just as corner row housing has been reviewed in preparation for this Report, it may be advisable to conduct a similar review of mid-block specific conditions and we would respectfully encourage this work.

Notwithstanding the collaborative and open nature of the review and Report preparation, Administration and stakeholder consensus could not be fully achieved on all of the Report's recommendations.

For example, perspectives may vary on the secondary suite options proposed. However, a preferred outcome would be one that offers more certainty and provides the opportunity for the benefit of R-CG row housing to prevail, beyond the concerns specific to secondary suites.

As well, while we do appreciate the work of Administration and the task force related to all aspects of the district, including height and setbacks, we would offer a cautionary note to ensure the district does not become overly prescriptive so as to create a 'box' that designs must fit into thereby reducing the opportunity for creative design and innovation.

Accordingly, we would strongly advocate for careful monitoring of the district, its implementation and outcomes, to ensure the intended results are being achieved and unintended consequences do not arise.

Again, we thank Stephen and the administrative staff for their work on this Calgary Planning Commission and Council direction and hope to continue collaborating as a key stakeholder.

Respectfully,  
BILD Calgary Region



Beverly Jarvis  
Director of Policy, Projects & Government Relations

c.c. Stephen Pearce, City of Calgary  
Tammy Henry, City of Calgary  
BILD Calgary Region Inner City Committee  
City/Industry/Community Stakeholder Task Force



July 26, 2018

Calgary Planning Commission

Via: Tammy Henry, Planner - Calgary Growth Strategies

**Re: Infill Working Group**

The Federation of Calgary Communities (the Federation) would like to express our support and thank Administration for our inclusion in the infill working group. Along with our member communities, Bridgeland-Riverside and Parkdale, the Federation has been meeting with Administration to address two of the 11 identified issues relating to infill development, and to draft amendments to the Residential Ground-Oriented (R-CG) District Monitoring Report.

Administration has been working to balance the views of our community representatives with those of industry to create draft Land Use Bylaw amendments, and we acknowledge that some of the necessary changes must be made through other business units to more appropriately address concerns about infill. Though direct input has been limited to a small number of Community Associations, the Federation has been committed to communicating the working group's progress to our expanded network and would like to thank the project team for attending our "Monday Matters" session to provide opportunity for discussion with our larger network.

The Federation has been satisfied with the collaborative approach of the working group. Moving forward, we would like to see opportunities to address a few outstanding concerns. Briefly, they include:

- Impact on the street frontage based on the maximum 4.5m setback rule in R-CG districts
- Increased lot coverage in R-CG developments, which will reduce urban canopy
- Decreased urban canopy in the rear yard due to subterranean development

The specific issues addressed during Phase 1 are also part of broader changes and must be addressed by looking at infill and redevelopment holistically. The Federation is committed to working with Administration during Phase 2 and would like to see the following:

- An outcome-driven process that clearly illustrates the input communities can provide
- A collaborative approach that includes other planning staff working on related projects such as the Developed Areas Guidebook
- A commitment to balancing the needs for redevelopment and life-cycling with concerns related to community context, character and fit
- Continued engagement opportunities for community input

T 403.244.4111  
F 403.244.4129  
E [fcc@calgarycommunities.com](mailto:fcc@calgarycommunities.com)

[calgarycommunities.com](http://calgarycommunities.com)





The Federation thanks Administration for beginning its work on the identified issues regarding infill development. We remain committed to working with Administration to address the 11 items raised by Council. As the support organization for over 150 community associations, we will continue to provide updates and support opportunities for engagement.

Sincerely,

**Ben Morin**  
Urban Planner

**Jennifer Miller**  
Urban Planner





# PARKDALE COMMUNITY ASSOCIATION (PCA)

3512 - 5th Avenue NW, Calgary AB, T2N 0V7  
Tel: (403) 283-5767 E-mail: office@parkdalecommunity.com

---

July 25, 2018

Calgary Planning Commission:

I was pleased to represent Parkdale Community Association Planning & Development Committee as a member of the working group established to review infill issues and discuss bylaw changes regarding front porches, subterranean development, and RC-G developments. The open dialogue and lively debates with City administration, industry partners, the Federation of Calgary Communities (FCC) and community representatives resulted in the balanced recommendations contained in the Report to The Calgary Planning Commission.

While I support the recommendations, as a community representative I recognize that my views are not necessarily shared by all communities. I encourage City administration and the FCC to share the recommended changes to the Land Use Bylaw with all communities prior to the Public Hearing of Council. This would ensure communities have the opportunity to address Council when the recommended changes are being considered.

I want to recognize the professional and collaborative approach of all the participants and thank Stephen Pearce and Tammy Henry for facilitating the working group and developing recommendations that balanced the views of the participants.

Sincerely,

Judy Hoad  
Co-chair, Planning & Development Committee  
Parkdale Community Association

CC: P&D Members  
PCA Board  
Infill Working Group





July 23, 2018

To Calgary Planning Commission,

We appreciated being part of the working group to discuss Infill issues and possible bylaw changes regarding front porches, subterranean development, and RC-G developments. The mix of City experts, industry partners, and community representatives facilitated a diverse, multi-pronged approach to these complex issues. There was high value in having all stakeholders at the table together to openly debate and question each other's points of view as well as to raise fresh issues warranting discussion from all perspectives. We would like to extend a heartfelt thank you to these colleagues on this work; it was an enjoyable experience due the genuine goodwill in the room as well as the openness and professionalism of the participants. Of course, even within our own community, we can only hope to represent a very small sampling of community views on these complex issues so we would recommend a broader "check in" on final recommendations.

The process itself, although originally expected to involve 2-hour monthly meetings, grew to encompass significantly greater inputs of time through additional scheduled meetings and extensive email discussions, a commitment that all participants and our City of Calgary hosts willingly embraced to ensure that enough time and discussion was given to the topics at hand. The research and materials development by both Tammy Henry and Stephen Pearce was strong and appreciated, allowing discussion to be well informed. We appreciated that all participants took this work seriously and participated extensively both during meetings and offline.

In relation to the topic of R-CG homes, the discussions were fruitful within the limited scope of what was being addressed at this time. Within the existing R-CG zoning type, the idea of making suites discretionary in rowhouses will allow each development to be weighed on its merits more effectively. Innovative solutions were identified to achieve more breathing room between the rear portions of rowhouses and adjacent yards and to move rowhouses forward on the parcel. Hopefully this will provide flexibility in the design envelope to facilitate architectural originality while improving the interface for adjacent neighbours who may not be in a rowhouse. Work was also done on the interface of rowhouses with the street, encouraging much more "human scaled" interfaces of low fences and doors facing both frontages. Moreover, the cross section rules newly proposed for upper stories will provide more pleasing designs and integrate better with existing neighbourhood character. The parking flexibility close to transit will allow for appropriate density increases in transit corridors. It is important to note that we still have some concerns regarding the impact on street frontages based on the maximum 4.5m setback rule. It will take significant modeling and/or tracking of the early units built based on the revised rule to measure whether these concerns will prove well founded. Regardless we generally feel the changes proposed will improve the R-CG zoning type moving forward.

Discussion also reinforced certain issues relating to the R-CG zoning type in general. To us, R-CG is far too limited in its scope and application. The current zoning does not allow for much variety in built form options for builders, and it encourages disproportionate lot coverage within the context of established detached and semi-detached homes in most instances. Even with the current changes to the R-CG rules, block-end treatments of the current built forms will have some negative impact on the amenity space areas of existing viable housing stock and other infill homes that may be adjacent to R-CG developments. At first blush, the difference between 45% lot coverage and 60% lot coverage may seem insignificant; however, in practice, once setbacks are deducted from the equation, the lot coverage for an R-CG at 60% fills almost the entirety of the remaining lot area, leaving very constrained "yards". In the

result, rear yard space / “breathing room” for landscaping, light egress, and livability in general—considerations that many single detached and semi-detached property occupants relish—is very adversely impacted by that 60% rule, and the result is a walled effect.

As a solution, builders could be encouraged to produce more creative designs for multiple unit structures which could potentially include stacked units, front-back orientations, and the like, all of which relate to context. This objective could be reached by changing certain build-related requirements from a focus on unit count to one based upon lot coverage based instead. Further removing DSSP and ground water retention requirements for R-CG builds with under 50% total lot coverage would be one step in this direction. There are undoubtedly other areas that could also help in a similar fashion. Creating opportunities for increased density while working within similar lot coverages (*i.e.* similar to single detached and duplex built forms), and also with massing and appearance more in alignment with single family and semi-detached homes - would go a long way toward allowing established communities to retain desirable character districts and housing variety while working to meet the MDP goals. It would be great to allow for more options to fill this gap within the district while still maintaining ground-oriented feel and we hope this will be considered in the near future.

In regard to subterranean structures we also have a few outstanding concerns. The proposed change is limited to front setback, which is rarely built into, and does not address the main challenges we see with more common rear lot subterranean development. The amount of parcel coverage of a subterranean structure needs some degree of restriction to leave some area of the property in the rear yard for the potential use for future trees, and/or for water management (if required). New infills already cause some loss of surface permeability as bigger homes are being built with more hardscape coverage on each lot. Further our urban canopy is being gradually eroded in the inner city / established neighbourhoods as this infill process continues. Our concern is that the ability for homeowners to plant any substantial vegetation in the rear yard is compromised by a lack of soil depth over subterranean structures that extend under most of the yard. This shallow soil could also exacerbate runoff issues and raise drainage concerns, all of which need to somehow be mitigated. Usually issues relating to runoff are not visible until after construction is complete, by which point a full rear-lot subterranean development does not leave anywhere to create a water-retention location by way of remedy, nor does it allow a tree to ever be planted. With the high cost of these types of lot-intense homes, these issues in the case of new construction could easily result in a 50-year or longer concern. We can appreciate that our colleagues have raised the question whether this should topic should be dealt with in the land use bylaw or in some other way via policy.

As for front porches, we will be interested to watch how the agreed upon changes work in practice, if approved. We support these changes and hope they produce useable porches that provide eyes on the street and active frontages at grade level. The changes still respect setbacks in established communities; however, we would like to see some contextual relationship to neighbouring parcels taken into account, an idea which was not included to avoid significant projection ahead of existing homes. We want to promote walkable, safe, and neighbourly communities, and porches can help achieve this broad goal. In hindsight, we would have preferred that the porch discussion, which was reviewed in isolation from the other infill issues planned for phase two (massing, height, context, etc.), be reviewed at the same time as these other elements. But within the limited scope of the working group, the work regarding front porches is positive step forward.

We very much enjoyed the opportunity to contribute to this group. The collaborative efforts of the team were much appreciated and it was a pleasure to work with everyone involved. We hope to do so again in the future.

**Ali McMillan**  
Planning Director, BRCA Board  
[planning@brcacalgary.org](mailto:planning@brcacalgary.org)

**Joe Belland**  
Development Chair, Treasurer BRCA Board  
[treasurer@brcacalgary.org](mailto:treasurer@brcacalgary.org)