



July 26, 2021

City of Calgary
P.O. Box 2100, Station M
Calgary, Alberta
T2P 2M5

Attention: Renae Demolitor

**RE: Application for Rezoning
3204 14 Street SW
Your File Number LOC2021-0100**

The Mount Royal Community Association (MRCA) and its Planning and Development Committee (PDC) is writing to express its concerns with the above noted application.

The MRCA hosted a town hall meeting July 22 with about 70 registrants. Sarina Homes was invited to present its proposal and answered questions before the MRCA presented information relating to the planning process associated with a redesignation and the fundamentals of the Restrictive Covenant that is on title for this parcel (and many other parcels in Mount Royal). Several polling questions were posed throughout the evening. The first asked respondents whether they supported or opposed the redesignation; more than 90% were opposed. The following outlines the reasons for such opposition.

1. The Upper Mount Royal ARP, adopted in 1996 was, and remains a special and unique ARP. The document identified itself as the first "mini-ARP" as it focused on both a limited geographic area and a limited range of issues (p. vi). It is critical to understand the value of the ARP's primary goals. They include preserving the community's special heritage character as created by the unique housing stock, landscaping and streetscapes and its special sense of place established by the natural topography, street layout, park spaces, subdivision patterns and siting of houses. Mount Royal is indeed a one-of-a-kind neighbourhood and the desire of the City and residents was to maintain that special character through sensitive redevelopment and respect for its history.

Residents choose to live in Mount Royal for several reasons, including the desire for graceful tree canopies, houses not overwhelming individual lots and the character of an original garden suburb. The Municipal Development Plan (MDP) recognizes our ARP and its policies that provide specific direction to the local context (Section 1.4.6). It directs that when making land use decisions "...the specific policies and design guidelines of that plan will continue to provide direction." (Section 1.4.7). Context must be applied when moving from an MDP principles-based document to that of a local one, and the notion of discretion becomes paramount. The proposal does not meet these principles in this context.

2. The MDP sets out several related principles and policies that must be considered when evaluating this land use amendment. The first addresses redevelopment in Established Areas. Section 2.2.5, as its prime objective states "Reinforce the stability of Calgary's neighbourhoods and ensure housing quality and vitality of its residential areas". The stability of Mount Royal has remained constant over the years, with sensitive redevelopment throughout the community, introducing new architectural styles and upgrading original century old homes. However, this application to rezone land, described by the applicant as a "test", will rapidly reverse that stability. People will stop investing in their properties when they realize the value of their property is based on land value and the house and landscaping are no longer relevant. That can cause a ripple effect for the adjacent parcels and beyond as more and more developers want to "test" the market and assemble land. While the MDP suggests modest redevelopment is possible, it should focus such development on Neighbourhood Activity Centres (Section 3.5.3 b). This site is not an activity centre.
3. The MDP also outlines principles behind the Main Streets Concept and then indicates, on Map 1, where Urban and Neighbourhood Main Streets should be generally situated. The MDP suggests that "Development opportunities within the Main Street areas relate to their existing role as retail streets..." and that we should "Plan the development of Activity Centres and Main Streets appropriate to the local context (Section 2.2.1) The Map indicates that 14th Street from SAIT in the north to 33rd Avenue in the south would be an Urban Main Street, while 33rd Avenue would be a neighbourhood Main Street.

The City advanced an aggressive program to develop key Main Street areas three years ago. For example, it extended zoning along 17th Avenue SW from 14th Street to 37th Street SW as an Urban Main Street and 33rd Avenue as a Neighbourhood Main Street. It did NOT include this portion of 14th Street.

Most of 14th Street to the north part of Mount Royal has developed, including a portion of the east side of 14th Street in Mount Royal. However, the remaining southerly four block faces (Council/33rd to Prospect) of 14th Street contain single detached housing, and two of those block faces (including the subject property) face the west side of 14th Street which contains a park, a fire hall and a library. Main Streets are typically "double loaded" with commercial uses; these two blocks in Mount Royal are not double loaded or commercial, diminishing its potential develop as a Main Street, especially as an Urban Main Street.

The City is also focusing its efforts on the high priority Main Streets that are most likely to succeed in the shorter term. If the City allows for Main Street type development in the lower priority areas like this portion of 14th Street, it will take longer to develop the highest priority and highest benefit areas due to limited market demands. The section of 4 blocks on the east side of 14th Street in Mount Royal is questionable as to its potential status as a Main Street because of its single loaded residential nature, and more importantly, its role in the setting of the Mount Royal neighbourhood character for its western boundary.

4. A core premise of the MDP speaks to establishing a balance of development in the Established Areas and greenfield sites, aiming to accommodate 50% of Calgary's growth in Established Areas. The MDP identifies nodes and corridors as key areas on which to

focus that redevelopment in the most cost-effective way. The long-term target is to achieve 27 residents/ha—our community has reached 24 and should meet the target of 27 with existing zoning. The MDP also encourages existing neighbourhoods to retain their stability, which in turn encourages re-investment and population replacement. Our schools continue to thrive – they are not suffering from the loss of new families and children – and our community continues to prosper, while maintaining the special nature and character the ARP described so well. City strategy should be to focus on key areas for density increases. This site and portion of 14th Street is not a key location and can only draw demand away from the priority areas.

Mount Royal has an amazing mix of types of housing. Presently about 68% of our housing stock consists of row housing and apartments, much higher than the City average of 33%. For example, in some developing suburbs, 34% of the housing stock in Sage Hill is classified as row or apartment; this drops to 19% in West Springs. Some may argue we can't include Lower Mount Royal in our statistics. However, our community historically and currently defines itself as Mount Royal, which includes Lower and Upper Mount Royal. Attempting to split the community to attack density numbers is divisive and undermines community spirit.

5. The applicant provided "aspirational" site plans and renderings. While not the primary focus of the meeting, many voiced concerns via the chat function about using Joliet as the new frontage. The building edge fronting 14th Street was a significant wall and the layout broke the rhythm of the streetscape and was jarring, while auto access further detracted from the visual appearance of the site. Many other development permit type concerns were raised, including of course, the range of uses allowed in the proposed zone.
6. Restrictive covenants blanket most of Mount Royal, including the subject site. These covenants have protected the nature and character of development of the neighbourhood more than 100 years ago, by establishing front yard setbacks and limiting use of the property to single-family homes. It could be said these covenants were in fact a "mini-ARP" before the term was used because they established the underlying principles governing the development of Mount Royal.

One polling question asked if it was important to enforce these covenants, the vast majority, over 90% said yes. Residents will challenge in court any attempt to remove the covenant or to build a structure that does not follow the requirements of the covenant, including limiting the use to a single-family home on this parcel, or any other parcel.

Conclusions

1. Mount Royal is a special heritage district that is unique to Calgary. Previous City Councils and planning staff recognized that by adopting the ARP.
2. The MDP outlines broad principles for the evolution of our city, but constantly stresses the importance of placing those principles in context, applying discretion and valuing and respecting the local plans presently in place.

3. Main Streets set out a pattern of development by focusing on high priority streets before moving to low priority streets. This this four-block section of 14th Street is not a high priority for Main Streets. In fact, it may not even be appropriate for consideration when that local context is applied. Its removal will not damage the concept of Main Streets and, indeed, may actually encourage development to focus on the more important locations.
4. Finally, this attempt to redesignate one parcel of land as a "test" does not advance the Main Street, density and range of use principles of the MDP. In fact, it erodes key principles that reinforce the stability of neighbourhoods such as Mount Royal. The City needs to follow the MDP priorities for new density and the focus of Main Streets, rather than reacting to the whims of the building industry.

Therefore, we would request that the City refuse to redesignate 3204 14th Street from R-C1 to R-CG.

Yours truly,

MOUNT ROYAL COMMUNITY ASSOCIATION

[original signed by Michel Bourque]

Michel Bourque
President

[original signed by Roy Wright]

Roy Wright, RPP, MCIP
Co-Chair, Development and Planning Committee