

Wildwood Community Association

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Calgary City Council:

Re: Secondary and Backyard Suites

Wildwood Community Association (WCA) has considered the merits of the proposed Land Use Bylaw Amendments to enable Secondary and Backyard suites across select Wards in Calgary. We find these amendments to be flawed in principle and strongly oppose adoption by Council on the basis that they:

1. Are overreaching in terms of Calgary's planning challenges
2. Will degrade the quality of thousands of Calgary properties
3. Negatively discriminate against established neighbourhoods in targeted Wards

1. Overreaching in terms of Calgary's planning challenges

WCA has worked with the City on single family community development issues for nearly 60 years. The issues have included infrastructure but also matters related to the City's desire to build strong communities. To support our participation in the planning process, WCA gathered input from the community in 2009 to produce a Development Charter which captured the development related principles that are important in our community. The principles that guide development in Wildwood have been:

- Wildwood is a people-oriented neighbourhood, (demographic diversity)
- Wildwood is proud of its landscape,
- Wildwood supports contextual development, (Including replacement homes)
- Wildwood is committed to community involvement

As recent as one year ago the City sought reaffirmation of these same community principles in its "Inspiring Communities" initiative yet the amendments appear contrary to this continuity. The bylaw amendments also cast aside planning objectives employed in new communities for the last 20 years where the concept of incorporating a range of housing density forms within each region was paramount. The amendments are inconsistent with the Municipal Development Plan Policy which doesn't seek to eliminate single family detached housing types and recognizes that within most Wards or regions, single family housing is already balanced by various types of multi-family housing.

The proposed amendments override these concepts for specific Wards and replace them with blanket high-density zoning. This over simplified blanket approach to re-zoning turns decades of collaborative community building on its head by concluding that the only planning criteria that matter are increased density, administrative efficiency and affordability.

There is little evidence that these narrow criteria will even be met by the Amendments. Administration's Report M-2015-002 to the Calgary Planning Commission anticipates that the "majority" of applications resulting from the Amendments will come from existing suite owners "seeking compliance". We expect this to be a gross understatement but, if true, it undermines the likelihood of increased affordability and increased density. Are landlords upgrading their suites for compliance likely to put them back on the market at reduced rents? The rational expectation from increased opportunities for secondary and backyard suites is an increase in the number of illegal suites. This expectation was validated by a 2013 study of suite owners in Ward 1 conducted by Pantheon Research.

WCA is also concerned that the drivers behind the blind pursuit of increased density are being applied selectively to suit other interests. Recent reports of the West Village being considered as the site for a combined sports-plex, instead of the planned densely populated urban district, raises serious questions around planning policy coherence.

2. Degradation of Properties

The proposed bylaw amendments will increase density for both R-C1 and R-C2 zoned properties. As a neighbourhood with both land use designations there would be significant impacts on transportation, parking, schools, parks, other community amenities and utility infrastructure in Wildwood. In addition to these adverse effects, it is reasonable to expect that there would be deterioration of the quality of individual properties and the sense of community as a whole.

By allowing Backyard suite development, privacy and enjoyment will be lost for all adjacent properties as trees are removed and overlooking windows are added. Alley-ways will be subject to usage levels they were not designed to accommodate as they are transformed into illuminated, busy roadways with overflow parking and the potential of limiting fire and police access. The City will also experience increased grading and maintenance costs.

Community demographics and pride of ownership will also change with these amendments and not for the better. Communities go through natural age cycles but the commonality within established communities is pride of ownership and commitment to the community from a longer term perspective. Increased development of rental properties will erode both of these aspects of community. Landlord investment decisions are market driven compared to an owner's investment intended to build long term value in their property. In many rental situations, residents meticulously maintain their accommodations and are active in the community but the reality of renting is that leasing arrangements are not in the resident's control and produce higher turnover in the community than home ownership.

3. Discrimination against Wards 7,8,9 and 11

The low density neighbourhoods in Wards 7, 8, 9 and 11 are being subjected to these bylaw amendments on the basis of current administrative Ward boundaries. These neighbourhoods are no different than low density neighbourhoods in other wards yet for the reasons stated above, will have the quality of their properties degraded relative to similar properties in unaffected wards. The purported benefits of increased density, administrative efficiency and affordability, if they materialize, will benefit the City as a whole yet the costs will be unfairly borne by residents in select neighbourhoods.

As proposed, these amendments will stratify the existing low-density neighbourhoods in Calgary into three tiers:

- Tier 1: Direct Control neighbourhoods with special rules,
- Tier 2: Neighbourhoods where the single family standard is maintained, and
- Tier 3: Ward 7, 8, 9 and 11 neighbourhoods with increased build-up and density.

Are the planning issues sought to be resolved by these Bylaw Amendments really worth the risk of stratifying our city in this way? By identifying Secondary suites as a Permitted use and Backyard suites as Discretionary, immediate neighbours will have no chance to comment on the appropriateness of a Secondary Suite. Also, neighbours would have limited opportunity to influence the outcome of a Development Permit “negotiations” between the Development Authority and the applicant for a Backyard Suite. Given that the issues involved in Backyard Suite applications are privacy, overlooking, overshadowing, architectural appearance and parking, these applications have the potential to be more disruptive to neighbours than infill applications.

Wildwood Community Association is strongly opposed to the Bylaw Amendments coming before Council as standalone Amendments without coincident consideration of the other three aspects of Council’s directions to Administration on December 15, 2014. Administration was also directed to;

“return to Council by Q2 2015 with a report outlining the procedures and implications of a licensing system for secondary suites, feasibility of a plebiscite on secondary suites including potential question and allowing secondary suites in a radius around rapid transit stations.”

Clearly, all four of these directions are integral to the consideration of Bylaw Amendments and debate of the Amendments should not proceed on a partial response to the Council Directives.

This process is being driven by interests without an open consideration of alternatives. This all or nothing proposal for four Wards provides no opportunity for consideration of other amendment proposals such as:

- City wide implementation or community by community implementation,
- separation of zoning for Secondary suites from Backyard suites,
- review of regional density measures with a focus on Town centers, and
- owner occupation rules.

Wildwood believes Calgary can do better than these narrow Bylaw Amendments and would like the opportunity to participate in the discussion of alternatives with all Calgarians.

Thank you very much for your time and consideration. We would value the opportunity to speak with anyone from Council who would like to hear more from us.



Robyn Birdsell
President, Wildwood Community Association