

Community Association Letters

12 February 2018 – Response to Initial M-H1 Proposal



Planning Committee
917 Centre Avenue NE Calgary AB T2E0C6
broacalgary.org

Circulation Control
Planning, Development & Assessment #8201
The City of Calgary
PO Box 2100 Station M
Calgary AB T2P2M5

ATTN: CPAG.Circ@calgary.ca
RE: LOC2017-0405 (717 McDougall Rd NE)
Co: Brad Bevill (brad.bevill@calgary.ca)
Ali McMillan, Planning Director (planning@broacalgary.org)

12 Feb 2018

To Whom It May Concern:

Thank you for the opportunity to comment with respect to the Land Use Amendment for land at 717 McDougall Rd NE.

The review of this Land Use Application, which proposes an amendment to the existing M-C1, (to accommodate a multi-unit residential development of mixed use, increased height and density M-H1), by our community Planning Committee involved notification to neighbours adjacent to the subject parcel inviting them to the Planning Committee meeting on 5 Feb 2018. Approximately 13 neighbours attended and several others expressed concerns through email. The comments below regarding the LOC application are those of both neighbours and the BRCA Planning Committee members present at the 5 Feb 2018 meeting.

Also, before submitting this application, the developer had engaged in discussions with certain City parties and also with select members of the BRCA (not then acting in a representative capacity). During this pre-application phase, the developer expressed interest in securing site zoning beyond the current MC-1 to allow for some increased density. Based on the proximity of the site to Memorial Drive and the core, the potential for the property to buffer the community from traffic noise, and the walkability of the site, the general tenor of such conversations was to the effect that a reasonable increase in zoning would likely be supportable based on thoughtful and justifiable benefit to the community and assuming feedback from affected residents. This was clearly communicated in pre-application discussions with the applicant along with the suggestion that the making of a concurrent application would enhance the credibility of the objectives professed by the developer, and also that such an approach would allow a better engagement with those in the area who would predictably have concerns about any potential "upzoning" of the site in question.

Community Association Letters

It has been some time since that meeting, and the applicant is now seeking a significant rise in zoning from the existing M-C1 to a land use designation of M-H1. After due deliberation, we are **opposed to the M-H1 re-designation** at this time for several reasons:

- The applied-for zoning is not tied to development permit plans. While a concurrent DP is under City review (DP2017-5883) this LOC application is not tied to those plans (although the applicant references a DC in their cover letter?). The community therefore has no assurance that the “promised” design will result in the “promised” result. With an approved MH-1 zoning, the developer could change architectural direction and develop a project that reaches far beyond the developer’s stated objectives - to the fullest limit of the newly approved zoning; drastically increasing density, unit count, building height, and streetscape impact. The potential impact can be dramatically greater than the concept illustrated in the theoretical design presented by the developer. Alternatively, the developer might elect to sell the site with its newly-approved zoning to another developer who has made no such development claims about limitations on density or otherwise to the community. In any case, BRCA would seek to have this be a DC tied to plans, in the event of rezoning.
- Previous discussions with the applicant were based around the idea of reasonable and incremental “upzoning” based upon perceived supportable benefit to the community/area, the lofty design claims of the proposed project, and (importantly) proof of support by surrounding neighbours. The current application does not and has not fulfilled these premises. In fact, there has been no supportable rationale given by the developer in respect of any of these items to this point in time—and, once again, this is an aspect of the file regarding which concurrent development permit plans would cement the applicant’s stated vision for the site.
- The zoning proposed, in the location proposed, is being met with significant opposition by local area residents. The BRCA Planning Committee and local residents who have responded to this application, feel very strongly that a lack of planned approach to such significant changes is detrimental to the community as a whole, and that proper decisions on increased zoning cannot occur in isolation of broader considerations. It is a very presumptuous statement by the developer in their application to state that their proposed development will “provide the sought-after density and gentrification within Bridgeland-Riverside”.
- The Bridgeland Riverside community will soon benefit from a new Area Redevelopment Plan (ARP) and is now well into this endeavour. Although there will likely be areas of significantly increased density identified in a new ARP, it is presumptuous to forecast the outcome of this specific location within a community-wide engagement process that is today incomplete - but the results of which are scheduled to be known within the year.
- The City has recently implemented a City-initiated re-zoning project for a significant corridor of properties just one block west of this application site via the Main Streets Project, which allows for up-zoned built forms including M-U1 and higher. With this new re-development area created by Main Streets and the prevalence of higher zoning permissible within it, the City has already identified an area suitable for this exact zoning typology after extensive research and engagement of its own. The parcel in question is outside this studied area. Issues arising here are not just the long-term future for what is currently called West Riverside but also the correspondence between built forms in the Main Streets areas and the site of this application. The BRCA has been largely accepting of and participatory regarding these increased density objectives within the areal limits of the Main Streets Project, but extending similar zoning (and the ensuing built forms) to the remaining, yet-to-be-studied- or-considered areas is not justifiable. It may never be justifiable, but certainly it is not justifiable today.

Community Association Letters

without broader consideration / community-wide planning being completed first.

- Access to this site is somewhat constrained and a comprehensive look at parking/traffic patterns in the area is warranted in this case. We would request that a Transportation Impact Assessment be conducted to determine impacts of increasing density both on this site and in the vicinity generally, in view of anticipated Main Streets changes as to what is feasible.
- Our community has been enthusiastic about our upcoming Area Redevelopment Plan undertaking as an opportunity to say, "Yes in my backyard" with a planned approach. Even after having explained to this applicant the reasonable reaches of such an application, having explained the rationale behind BRCA's proposal regarding the bringing of a concurrent application, and having outlined the topics to be addressed by the applicant if the applicant expects to find and secure community support, the applicant has been non-responsive on all key points. As a result, and especially without there being any solid (or even any) support for this application by stakeholders in the area, we find that this application has failed in all aspects of "engagement" rationale and is unsupportable. If this application were to succeed, then we would inevitably be left feeling that the consultation process is irrelevant and that the forthcoming ARP process has been hollowed out before it has even begun, leaving us with the "site by site" (aka "ad hoc") planning that has exhausted so much energy for all stakeholders, including the City, these past recent years and resulted in a continually adversarial planning process.
- Judging by the level of concern from residents in the area, we feel (and have previously suggested) that the developer needs to host an open house on this land use change. They have not yet done so.

Sincerely,

BRIDGELAND-RIVERSIDE COMMUNITY ASSOCIATION

Per: BRCA Board of Directors Planning Committee

Community Association Letters

4 April 2019 – Response to Amended Proposal to M-C2



Planning Committee
917 Centre Avenue NE Calgary AB T2E0C6
broacalgary.org

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The City of Calgary
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ATTN: CPAG.Ciro@calgary.ca
RE: LOC2017-0405 (717 McDougall Rd NE)
Cc: Brad Bevill (brad.bevill@calgary.ca)
Ali McMillan, Planning Director (planning@broacalgary.org)

4 April 2019

To Whom It May Concern:

Thank you for the opportunity to comment with on this applicant's second Land Use Amendment for land at 717 McDougall Rd NE.

This second review by our community Planning Committee on March 20th of a Land Use Application for this site, which proposes an amendment to the existing M-C1 to accommodate a multi-unit residential development with increased height and density, by changing to M-C2 involved notification to neighbours adjacent to the subject parcel via email. Notification was based upon the previous application and the previous neighbor attendance roughly a year ago. Approximately 6 neighbours attended this latest meeting. The comments below regarding the LOC application are those of both neighbours and the BRCA Planning Committee members present at that meeting.

This application has been ongoing for many years with both the scope and design changing often. Alongside this timeline, the Bridgeland-Riverside ARP update process has been ongoing. Concerns were brought up in this latter application specifically about transportation access in West Riverside where this site is located. Since there is limited access in and out of the site area, appropriate density needs to be considered (balanced with transportation/congestion considerations). This has been previously discussed with both the applicant and the file manager over the past several years.

It has also been previously discussed that, based on the proximity of the site to both Memorial Drive and the core, the potential for the property to function as a buffer for the community from traffic noise, and also the walkability of the site,

Community Association Letters

a reasonable increase in zoning (density) would likely be supportable based upon anticipated benefits to the community, and also assuming (of course) supportive feedback from those residents or persons most directly affected. This was clearly communicated to the applicant in pre-application discussions, alongside the suggestion that a concurrent development-permit application would enhance the credibility of the objectives proposed by the developer, and also that such an approach would allow a better engagement with those in the area who would predictably have concerns—in the abstract—about any potential “upzoning” of the site in question. However, during the ARP process, the City effectively “downzoned” the area from what had originally been proposed due to the transportation considerations mentioned above.

For this site, we are still awaiting a new DP application as the last one put forward was over-scaled significantly for the site – and this concern still stands with a proposed M-C2 zoning. Without further restriction and in the case of poor design, M-C2 could still potentially be over-massed for the context.

Therefore, BRCA still identifies the following concerns to be addressed;

- The applied-for zoning is not at present tied to development permit plans. While a concurrent DP is apparently coming for the City’s review (DP2017-5863), this LOC application is not tied to those plans. The community therefore has no assurance that the “promised” design will result in the “promised” result. In other words, with an approved M-C2 zoning in place, the developer could either: a) arbitrarily and significantly change architectural direction and seek to develop a project to the fullest limit of the newly approved zoning (increasing density, unit count, building height, and streetscape impact). The potential impact can be dramatically greater than the concept illustrated in any theoretical design presented by the developer; or b) the developer might elect to capitalize and sell the site with its newly-approved zoning to another developer who has made no such development claims about limitations on density or otherwise to the community. These are strong reasons why the BRCA would seek to have a DC tied to plans, in the event of rezoning.
- Previous discussions with the applicant were based around the idea of reasonable and incremental “upzoning” based upon perceived supportable benefit to the community/area, the quite lofty design claims of the proposed project, and (importantly) proof of support from surrounding neighbours. The current application has not and does not meet these conditions. In fact, there has been no supportable rationale given by the developer in respect of any of these items to this point in time—and, once again, this is an aspect of the file regarding which the offering of concurrent development permit plans would cement the applicant’s stated vision for the site.
- The zoning proposed, in the location proposed, is being met with significant opposition by local area residents. The BRCA Planning Committee and local residents who have responded to this application feel very strongly that a lack of planned approach to such significant changes is detrimental to the community as a whole (including while ARP discussions remain outstanding), and that proper decisions on increased zoning cannot occur in isolation of broader considerations.
- The City has recently implemented a City-initiated re-zoning project for a significant corridor of properties just one block west of this application site via the Main Streets Project, which allows for up-zoned built forms. With this new re-development area created by Main Streets and the prevalence of higher zoning permissible within it, the City has already identified an area suitable for this exact zoning typology after extensive research and engagement of its own. The parcel in question is outside this studied area. Issues arising here are not just the long-term future for what is currently called West Riverside but also the correspondence between built forms in the Main Streets areas and the site of this application. The BRCA has been largely accepting of, and participatory regarding, these increased density objectives within the areal limits of the Main Streets Project, but extending similar zoning (and

Community Association Letters

the ensuing built forms) to the remaining, yet-to-be-studied- or-considered areas is still concerning – what is the plan?

- Access to this site is somewhat constrained and a comprehensive look at parking/traffic patterns in the area is warranted in this case. We would request that a Transportation Impact Assessment be conducted to determine impacts of increasing density both on this site and in the vicinity generally, in view of anticipated Main Streets changes as to what is feasible.
- Our community has been enthusiastic about our continuing Area Redevelopment Plan process as an opportunity to say, "Yes in my backyard" with a planned approach. Even after having explained to this applicant the reasonable reaches of such an application, the ongoing ARP process, and the rationale behind BRCA's proposal regarding the bringing of a concurrent application, and having outlined the topics to be addressed by the applicant if the applicant expects to find and secure community support, the applicant has been non-responsive on all key points.
- The applicant has not held any open houses to date on this proposal, nor recently engaged with directly affected neighbours on this revised development strategy. As a result, and especially without there being any solid (or even any) support for this application by stakeholders in the area, we find that this application has failed in all aspects of "engagement" rationale and is unsupportable. We request that authentic, high quality engagement be done on this file. Based on the level of concern from residents in the area, we feel (and have previously suggested) that the developer needs to host an open house on this land use change. They have not yet done so.

Sincerely,

BRIDGELAND-RIVERSIDE COMMUNITY ASSOCIATION

Per: BRCA Board of Directors Planning Committee