

## Community Association Letter

2019 October 28 – *via email*

To Joseph, Morgan and Melanie,

On behalf of the planning committee for the Springbank Hill Community Association I am providing you with our updated comments regarding the land use amendment plan for the Slokker proposed development at 85th Street & 17th Avenue SW.

Based on our interpretation of this land use application we are unable to provide our support at this time.

The Springbank Hill ASP was passed and approved by Council in the Summer of 2017. One of the primary objectives of the ASP was to create a cohesive plan for the 190 acre study area. By creating 5 neighborhood area density zones, placement of neighborhood nodes, and a neighborhood activity centre, the intended goal was to avoid the potentially inconsistent development approach that might otherwise occur as a result of having over 15 different land owners and developers in the study area.

At this time only 5 applications have been reviewed by CPC and council, within the 190 acre study area. Four were within the bounds of the ASP in terms of density, and build form. The 5th application requested a density increase of 150% without an ASP amendment, and we understand is currently under review. These 5 applications account for less than 20% of the 190 acre study area.

The subject of this letter, LOC2018-0085, represents the 6th application which will soon go to CPC for review.

As a result of our discussions with city planning, and with the applicant, we are very concerned that there appears to be a willingness to allow substantial increases in density and modifications to build form, and an increase in the amount of retail/commercial development versus limits originally established in the ASP. We are also concerned about the apparent lack of a formal mechanism or process to address the cumulative impacts of individual development changes on the overall 190 area study area, in terms of infrastructure needs, additional traffic impacts and other impacts to the existing community. We are also very disappointed with the city in that after many years of work and engagement with the community to establish an approved ASP in 2017 you appear to be prepared to dismiss the requirements and limits in the ASP document that were established by you and accepted by the community.

In reviewing this land use application there are several issues we wish to raise:

1. Request to change the ASP 'medium density' zone to 'mixed-use zone' in the area south of 19th Ave

The applicant has requested an ASP amendment to change the medium density zone to mixed use south of 19th ave along 85th street. Our understanding after discussing this with the planning department is that the applicant believes that the community will support additional retail offerings.

We are concerned that pushing retail development further south is outside the scope of the ASP and seems to be excessive in our opinion. We note that there is 260,000 sq ft of retail planned less than 100 metres from this location on the north side of 19th ave as per the ASP. There is

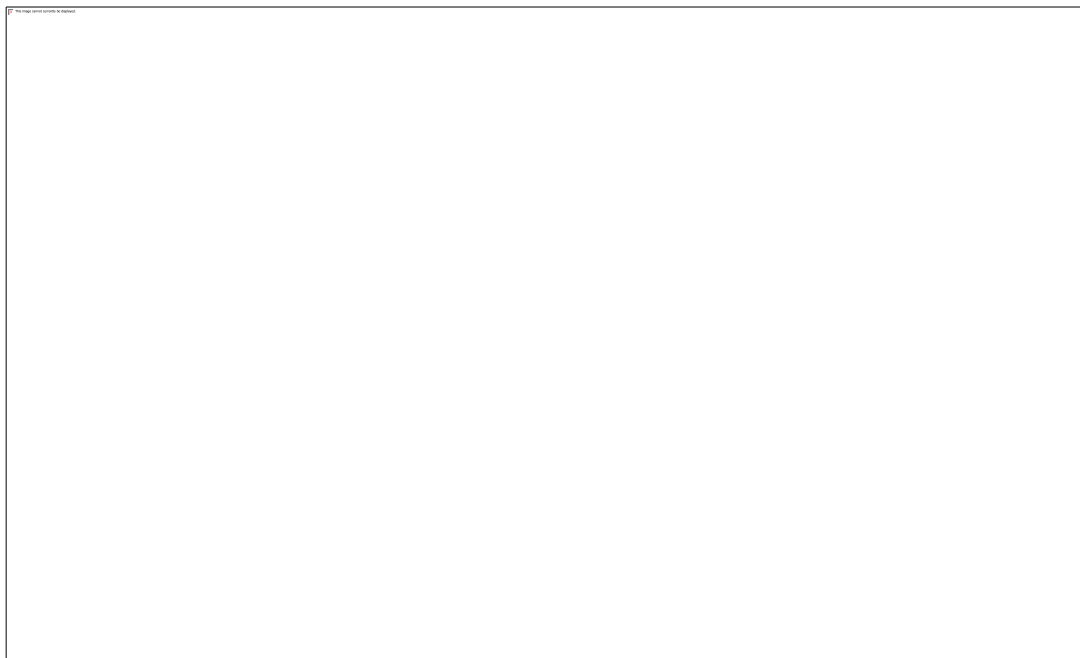
## Community Association Letter

also an existing retail node less than 400 metres south of this location on the west side of 85th street. In addition, the existing Aspen Landing shopping mall is less than 400m north of this location. We had previously expressed concerns about potential traffic issues in our community and it is our believe that the additional retail will only make the problem worse.

The also wish to note that the ASP identifies a goal to achieve a pedestrian friendly 'livable street' on 19th Ave, incorporating a blend of retail and residential. We are very concerned that the proposals to date are not incorporating the desired design features for this mixed use area as originally defined in the ASP. We supported the following design elements when the ASP was approved but we have yet to see these elements included in any of the proposed developments:

- All development sites shall provide short, direct and convenient multi-modal connections to the community
- Active Modes Crossings shall be integrated within the site
- At-grade units should be oriented to the street and provide a seamless at-grade transition to the public sidewalk
- Sites shall incorporate a pedestrian-scaled lighting and street furniture treatment that contributes to a high quality urban environment
- Parking should be located underground where possible
- Where surface parking areas are considered, they should: a) be located at the rear or side of buildings and screened with landscaping; and b) incorporate Low Impact Development (LID) treatments to reduce environmental impacts

As a specific example, we are concerned with the proposed design of the condo building on the southeast corner of 85th St and 19th Ave SW. As shown in the attached illustration provided by the applicant, a retail mall is incorporated into the first floor of the a condo building with no street level access from 85th or 19th ave, a large surface level parking lot. This is not a pedestrian friendly design! We can't expect to achieve the goals stated in the ASP if we continue to allow the same type of automobile friendly designs!



## **Community Association Letter**

We also request that the planning department provide the community with a sound basis for their recommendation to amend the ASP, only two years after establishing the original ASP guidelines.

### 2. Request to change the ASP 'Low Density' zone to 'Medium Density', south of the new proposed mixed use zone on the south side of 19th Ave

We understand that the applicant is requesting to change the 'low density' zone in their original application to 'medium density'. This request would increase the ASP planned density by 135%. We also note that the ASP requires a transition and variety of build forms which may not be addressed in this zone.

We also understand that the planning department would consider the amendment from low density to medium density to create a better transition to the proposed new mixed use modification. We believe the critical discussion will be the decision for the mixed use area, and if there is no support for that decision then our view is that the low density area should remain unchanged.

### 3. Request to change the ASP 'Medium Density' zone south of 19th ave, east of the ravine, to DC

The applicant is effectively requesting a density increase of 40% within the proposed DC area, over the original ASP medium density zone. The planning department criteria for approving this appears to be based on the fact that this location is adjacent 19th ave which is planned to be a 'livable street'. The designation of 19th Avenue as a 'livable street' was the original intention of the ASP so we question why the original zoning in the ASP is no longer relevant.

### 4. Insufficient development plans have been submitted

In reviewing the land use application and submitted development plans to date, preliminary development plans have been submitted for only 25% of the land use area. We are questioning how this land use application can proceed without additional information regarding development plans and an understanding of the full impact on densities versus the limits placed in the original ASP.

### 5. Traffic Study Requirements

We have made numerous requests to the city traffic department and planning department, as well as the applicant, to review the traffic impact analysis of this and other developments. To date, we have not received a satisfactory response. The community had been given information on the traffic analysis based on the initial ASP plans but we are unaware of any updated traffic impact studies. As we believe the study area has a very limited capacity to accept increased traffic we request further analysis and discussion on this matter.

### 6. Pathways and Connected Communities

Given the current patchwork of development along 85th street the ASP vision of a continuous pathway through the community seems to have been lost, leading to disconnected paths, streets designated as pathways where traffic densities are unknown, a pathway now suggested on the westside of 85th (the original plan was to run paths on the east side), but without clear

### **Community Association Letter**

development plans we are concerned about the city's ability to deliver on it's vision. In reviewing current development plans, placement of residential buildings are being positioned to limit multi-modal traffic in an east west fashion, in essence creating a gated community, purposely making it difficult for the community at large to traverse the new developments. This is at odds with the city's planning criteria.

In summary, given the above 6 concerns, we cannot support this application. We are planning to meet with the applicant to discuss their plans in more details and to present our concerns. In addition, our community association requests that the city require the applicant to submit concurrent development plans for the entire land use application area, so that the planning department, CPC, council and the community can fully understand the impacts of the revised proposal to the overall 190 area study area development.

Finally, we question why the city would even consider deviating significantly from the original ASP plans for this area. The community has accepted the intentions of the original ASP, any amendment should require new community engagement sessions otherwise the entire ASP process loses credibility with the community.

Sincerely,

***Elio Cozzi***  
**President, Springbank Hill Community Association**  
website: [springbankhill.org](http://springbankhill.org)