Stakeholder Letters

Crescent Heights Community Association

February 25, 2019

Crescent Heights Community Association
1101 - 2nd Street NW
Calgary, Alberta
T2M 1V7

Standing Policy Committee on Planning and Urban Development (PUD)
reference item # PUD2020-0164

Re: North Hill Communities – Local Area Plan – Final Proposed Plan

We respectfully include our previous letter stating our concerns with the Local Area Plan (LAP) draft from January 30th, 2020 to this submission. The majority of our concerns included in the January 30th letter have still not been addressed or responded to in some detailed fashion.

Our first concern listed was with timelines and the unsustainable pressure on our volunteer base to respond to items in such a speedy manner. The first viewing of the final plan was on February 18th, 2020 to us as members of the Working Group. Our independent review and this corresponding letter to PUD needed to be submitted a mere one week and one day later. This is untenable, particularly as we are also grappling with the revised alignment of the Greeline. More importantly, the general public will have only had the ability to see the Plan from February the 24th to the 25th, and submit letters to PUD on the 26th. We understand that the community and its residents will be able to attend the Public Hearing scheduled for April 27th, 2020, but even this leaves us little time to get important information out to the community and parallels the Greenline engagement and response times. We strenuously object to the time lines that we have been presented with and feel that this impedes our ability to achieve meaningful feedback and the ability to work together to achieve a desired result.

Due to these same time constraints, we have been unable to do an in depth review of the changes to either the Guidebook or the Local Area Plan. As per our letter of January 30th (and further detailed there) we wish to underline the following main areas:

1. Timelines
   Unattainable and unsupportable by a volunteer organization.
   The revised alignment of Greeline and subsequent decisions and impacts that will be coming in the future further influences this Plan and are not adequately addressed and create a number of unknown influences that may impact our communities structure and composition. We believe that until this is better known, this Plan adoption must be delayed.

2. Local Area Plan Contents
   We have been unable to undergo a thorough review of the changes to the Guidelines as they pertain to Section 2.32. We find it concerning that changes were made to the Guidebook to reflect the Local Area Plan rather than the Local Area Plan adhering to the original direction. These last minute changes to bring both documents into alignment seem hasty and potentially ill considered when communities such as ours do not have adequate time to respond.
We continue to ask for the identification and recognition of individual community characteristics and the inclusion of community specific policies. Target, or existing, populations are not addressed in the Plan whatsoever and we can not comprehend the projected population for our community and how population changes would be handled in triggering plan changes or achieving goals. Furthermore, the potential impact of Greenline on subsequent traffic patterns is not in any way addressed in this Plan. How can such a major infrastructure change not be incorporated into our Local Area Plan?

3. Characteristics/Urban Form
The LAP now contains a section on Heritage areas [Section 2.13] which partly addresses our concerns and desire for a recognition of an alternate urban forms category. This is, in reality, merely an objective, and there is no guarantee that this will become a statutory policy. We further believe that this should be located in the Guidebook, so that all future communities can benefit should it become policy. We continue to have concerns over this aspect of the Plan and the lack of certainty it brings to our community.

4. Tree Canopy/Open space
We have now formally requested firmer and more meaningful policies under these areas twice, and it continues to remain unaddressed in the Final Local Plan.

In our previous feedback we made the following requests:
• Include firm policy wording on the protection of the tree canopy. Introduce enforceable legislation that supports this. Develop meaningful penalties if not followed;
• Detail how to “support and expand” the tree canopy in an ever-denser urban form;
• Introduce meaningful and actionable policy and plans to protect, enhance and expand our open spaces.

We do not see any real commitment in this plan to have our amenities, including parks, open space and tree canopies, maintained, improved, and considered in light of the anticipated increased density.

For the reasons listed above and those in our letter from January 30th, 2020 (below), the Crescent Heights Community Association does not support the North Hill Communities – Local Area Plan – Final Proposed Plan as submitted. We would like the opportunity to continue to work with the planning group to resolve our issues and find solutions in a reasonable time frame, with considerations for the other planning related issues that our community is currently addressing. It is in the best interests of all involved that this Plan be the best it can be.

We are hopeful that this groundbreaking multi-community plan can be achieved to our mutual satisfaction. We are eager for the plan to be a successful project for future communities to aspire to and hope that Council and the City will consider our concerns.

Sincerely,

By email only
Simonetta Acteson, Director of Parks,
North Hill Communities Working Group, CHCA Representative
On behalf of the Crescent Heights Community Association
cc. Troy Gonzalez, RPP, MCIP, Senior Planner | Community Planning, The City of Calgary
Dale Calkins, Senior Policy & Planning Advisor, Ward 7
January 30, 2019

Crescent Heights Community Association
1101 - 2nd Street NW
Calgary, Alberta
T2M 1V7

Attention: Troy Gonzalez, RPP, MCIP
Senior Planner | Community Planning
Planning & Development
The City of Calgary

Dear Troy,

Re: North Hill Communities – Local Area Plan – Revised Draft

The Crescent Heights Community Association (CHCA) appreciates this opportunity to give the planning group our second round of feedback on the draft North Hill Communities Local Area Plan (the Plan). For the purposes of transparency with the group of communities participating in the Local Area Plan, we will be sharing this response with representatives from the other community associations.

We begin by saying that there are a number of elements in the Plan which we support and feel respect the needs of our community. These include the objectives and goals around Main Streets as well as policies and objectives that identify supporting design improvements, connections and beautification, to mention a few.

We also understand and appreciate that this is a huge undertaking for the City, and that we are the first group of communities to be put through this process. Because we are the test case, we feel it is even more important that the City take the time and care necessary before adopting plans that have not been fully tested on how they will be used by both the City and the communities they serve.

We continue to have concerns with the content, or in some cases, lack of content, as well as additional aspects of the Plan. Most especially we consider the timing of this Plan to be out of sync with the tools that we are told will be coming. It is almost impossible to truly gauge how this Plan, and the associated Guidebook for Great Communities will work without all the pieces in place. We refer most specifically to heritage tools and low density residential provisions that we are advised are to be added or changed. Until those items are fleshed out, we do not support the ratification of the Plan in its current form.

The exercises you had us participate in during the last session, using the Guidebook and the Plan to evaluate a proposed development, brought home what a large leap this will be for the many dedicated volunteers we have, and how it will necessitate even more of their valuable time to fully grasp applying either of these documents. This is concerning and we hope that the City will include training for volunteers as part of the Plan adoption process.

We have organized our feedback into four main categories: timelines; contents; characteristics/urban form; and tree canopy/open space.
1. Timelines
As City employees, it is your job to complete work on the plan in a timely manner. As volunteers with multiple other responsibilities and using our “spare” time, we are struggling to find the time to reasonably review and respond to drafts. We respectfully request that review and response times be extended to six weeks or more so that we can properly advise our CA, and allow for adequate time to receive, assimilate and return feedback. This would allow for at least one CA Board meeting circuit between workshops and revision needs.

For example, the most recent draft was submitted to us on December 20th. The next working group session was scheduled for January 15th. We typically do not do volunteer work over the holidays, so this effectively gave us less than two weeks to review the draft, determine if any changes made reflected our previous feedback and report to the board at our meeting on January 14th. Reports to the board on the January 15 session was sent by email. This was followed by meeting with stakeholders to gauge the need for, and nature of, our response. We were asked to provide feedback ASAP. Our board does not meet again until February 11th. Wading through multiple responses and suggestions takes time and we want to reflect as large a segment of our community’s wishes as thoroughly as possible. This is all completed using volunteer time. We hope you can appreciate the need for additional time in assessing and responding to a plan that will significantly change the way our community is envisioned in the future.

2. Local Area Plan Contents
In the Guidebook for Great Communities, under Section 2.32, we are provided with direction for what should be included in a Local Area Plan. We see gaps in this direction and the draft Local Area Plan. Below we copy and reference from pages 86-87 of the guidebook (in italics). Most specifically we see the following (our comments are contained in parentheses where applicable):

Chapter 1: Visualizing Growth
a. Identification of attributes:
   i. **Community demographics and trends** (not included either by individual community or by total)
   iii. ecological assets (park spaces are shown but there is no descriptors or definitions – i.e., school, playing fields, natural area, playground, etc.)
   iv. **Heritage or Cultural assets** (no identifications associated with Map 2)
   vii. **recreation and community facilities** (not identified, nor their current or potential capacities)
   viii. **special view corridors** (not identified)
   x. **mobility infrastructure** (roads are shown, no alleys, no pathways or bike routes)

b. The plan should support:
   iv. **protection and enhancement of natural areas and ecological functions** (we do not feel that the Plan has addressed this in any meaningful way)
   v. **recreation, civic, arts and cultural opportunities** (not identified therefore not supported)
   vi. **architectural, urban and natural features that contribute to a feeling of local identity and sense of place** (since these are not identified in the Plan, the Plan does not support these)

Chapter 2: Enabling Growth
E. A local area plan shall contain strategies for achieving the vision of the plan, including, but not limited to, community-specific policies for urban form categories, mobility, or amenities that supplement those contained within the Guidebook as necessary (we do not see any community-specific policies – the Appendix contains some community-specific targets, but is not statutory)
F. **Existing or new landmark sites or gateway sites and key view corridors should be identified, if applicable, and community-specific policy should be included to guide future development in these areas. (we do not see any identification or community-specific policies)**
j. Local Area Plans are encouraged to conduct water and sanitary analyses to understand the impact of projected growth on the utility network. (a clause or requirement for this analysis has not been included in the Plan).

Chapter 3: Supporting Growth

We do not see agreement between the Plan and the direction intended in the guidebook for this chapter. Policies for current and future amenities and infrastructure and strategies for their funding are not included in the Plan. Implementation actions have been identified in an Appendix, but strategies for funding are not identified. In addition, there is no identification of a priority of investments, identification of roles, identification of what tools (planning or financial) can be used, or the the identification of a complete community through the creation of an “Asset Map and List”.

These items are listed in the direction provided and are copied below:

k. Local area plans should:

i. identify the elements of a complete community (as referenced in the Municipal Development Plan) over a time horizon of growth and change in the plan area, through the creation of an “Asset Map and List” reflective of continual growth and change as described in Chapter 4 of the Guidebook;

ii. provide guidance to The City for future service plan and budget considerations and recommendations;

iii. identify the priority of investments for the community, taking into account the current status of the infrastructure and amenities and the plan for future growth and change;

iv. acknowledge that the timing of investment may be guided by external factors including service and activity levels, priorities identified in the plan, and the state of existing assets;

v. identify the roles for different city builders in supporting implementation (The City, developers, residents and businesses);

vi. identify and recognize the range of planning and financial tools that could support implementation; and

vii. be reviewed at a regular frequency as investment and actions are made towards plan goals.

We also call attention to the following from the Municipal Development Plan:

“2.3.2 Respecting and enhancing neighbourhood character

Objective Respect and enhance neighbourhood character and vitality

Policies

d. Ensure that the preparation of Local Area Plans includes community engagement early in the decision making process that identifies and addresses local character, community needs and appropriate development transitions with existing neighbours.”

In our opinion the Local Area Plan does not meet this Objective or Policy. Our Community was engaged, but in our opinion the engagement process was steered entirely to accommodate growth and did not provide an opportunity to identify our local character, or community needs. Appropriate transitions were discussed.

We want to see, as outlined above in the guidebook direction, considerably more community specific details, and the application of community specific policies.

3. Characteristics/Urban Form

For the purposes of our feedback we have grouped these items together. As pointed out above, there has been no effort in the Plan to identify individual community characteristics or assets, or to address the possible need for the recognition of alternate urban forms categories due to a desire to maintain certain characteristics. In our opinion
this is a major failing of the Plan. The process for overlaying new urban form over an existing urban form should include recognition of forms or places where a community wants to see effort to maintain its current state. If identified during the working session process, this has not been transferred to the Plan.

Our existing Crescent Heights Area Redevelopment Plan identifies several Goals, Objectives and Guidelines. Objectives such as:
• **Ensure new development is as sensitive as possible to the neighbouring housing.**
• **Recognize and attempt to preserve the historic character of the community.**
• **The character of the existing low density residential areas should be maintained while appropriate new development is encouraged.**

Clearly these objectives collide with the direction of the Plan. We believe that community residents do not fully understand how the policies in the Plan substantively change these prior directions. Certain areas in our community deserve to have the spirit of these objectives protected and maintained. These areas reflect elements of our community character in architectural style and history of place. They provide perspective and grounding. As a community we are told that policy in the form of heritage tools will be forthcoming, but these can’t be guaranteed and the details of how, what, or where these tools are to be applied are not yet available. In our opinion these tools need to be in place and where they would be applied needs to be shown in the plan before it may be ratified.

As a community, Crescent Heights has accommodated growth and welcomed increased density on a consistent basis. According to the City census (2016) 62% of our dwellings are in the form apartments, 8% in semi-detached, and only 27% of our community is in the form of single detached. A certain number of those 885 single detached homes are also newer infill development of various ages. As comparison, Rosedale has 81% of its population in single detached dwellings, 7% in semi-detached and 8% in apartment form. Renfrew to our east has 31% in single detached, 25% in semi-detached and 32% in apartment form. We already provide a significant quantity of denser urban form. We can accommodate more density, there is opportunity to further densify in various parts of our community in land use districts that already provide for additional density. We want tools that allow us to identify and direct densification in particular areas, and tools to encourage maintaining scale, detailing, and massing that helps our community retain a significant expression of its character.

In our letter dated December 12th recommended the following: Create another urban form category that reflects the existing historic scale and density and work with communities to define where, or if at all, this category could be maintained. We stand by that request and ask again that it be included. A mere promise that it may be coming is not sufficient.

Much of this desire is tied to our identification of our tree canopy as being one of our most important and valuable assets.

4. Tree Canopy/Open space

In our previous feedback we made the following requests:
• Include firm policy wording on the protection of the tree canopy. Introduce enforceable legislation that supports this. Develop meaningful penalties if not followed;
• Detail how to “support and expand” the tree canopy in an ever-denser urban form;
• Introduce meaningful and actionable policy and plans to protect, enhance and expand our open spaces.
In Section 3.1 of the Local Area Plan, there are four goals listed. The fourth goal is “Greening the City” which is described as “Conserving, protecting, and restoring the natural environment…”. In section 3.2, objective 15 is: “Support and expand the tree canopy throughout the plan area.”

In our opinion the Plan falls short on fulfilling this goal or objective and does not offer enough either in it’s content, policies or tools to accomplish this.

We believe that there is, or should be, universal agreement that tree canopy and open space are some of the greatest contributors to a city. These elements offer ecological refuge, sound deflection, shade, refuge, experiences of joy, social and emotional benefits, and aid in the overall wellness of both the natural environment and the people who live there.

We also believe that with a denser urban form it is virtually impossible not to lose significant trees and vegetation. When a small bungalow on a 50-foot lot is removed and replaced with a four-unit development, it is unlikely that any mature vegetation on that parcel will be retained. Replacement requirements can in no way replace the mature trees and bushes that originally populated that space. We encourage the City to continue its efforts towards resolving this, perhaps by initiating “price per tree” fee that requires developers to have trees inventoried before removal, a price allocated and paid, and a fund created that is used specifically to replace the tree in the general vicinity or contribute to a reciprocal green effort in the community. We would like to see specific policy in the Plan that addresses this.

It is also even more important that in these circumstances the City make every effort to retain, or where applicable, begin replacement ahead of perceived life cycle expectations in City owned lands. The wording in Section 2.1, policy 4 (copied below) remains “should” versus “shall” which of course have very different meanings.

Existing mature vegetation should be retained in City boulevards, in particular heritage boulevards identified on the City’s Inventory of Evaluated Heritage Resources, as well as in private landscaped areas along streets to maintain a consistent streetscape, help manage stormwater, and retain tree coverage along streets.

We strongly ask that this policy be reworded and that the policy read:

Existing mature vegetation shall be retained in City boulevards, in particular heritage boulevards identified on the City’s Inventory of Evaluated Heritage Resources, to maintain a consistent streetscape, help manage stormwater, and retain tree coverage along streets.

Linking back to our #3: Characteristics/Urban Form, we believe that by identifying and providing tools that can maintain existing scale, detailing, and massing in specific areas in our community also means that areas with the original housing form will retain some of the private tree canopy that currently exists in many places in our neighbourhood. No one can prevent an individual owner from chopping down trees, but community-driven incentives can help increase awareness of the importance of them to our community experience.

Policy 4 above could be further developed into a companion policy to support this:

Existing mature vegetation should be retained in private landscaped areas, in particular along streets, to maintain a consistent streetscape, help manage stormwater, and retain tree coverage along streets.

Lastly, there is very little included in the Local Area Plan that specifically addresses how our parks and amenities will survive and flourish as a significantly larger population accesses these resources.

Under 3.2, Item 4 the objective states:
4. Improve safety and comfort in existing parks and, where feasible, support a broader range of complementary uses that cater to diverse groups of users.

This objective only addresses “safety and comfort” and further supports increased use and uses. We ask again that the Plan ensures (or at minimum has an objective or policy) that increased use will be matched with increased maintenance and protection and, even more relevant, the creation of new green and open spaces when achievable. How this would be evaluated, and what resources might be available are other strategies we would want to see included.

We thank you for the opportunity to give you our feedback as a board. We hope that you will find our comments and suggestions of benefit to this process. We may want to submit additional feedback at a future date. It is, again, our sincere hope that the Plan can undergo significant changes that will reflect our concerns and suggestions.

Sincerely,

By email only
Simonetta Acteson, Director of Parks,
North Hill Communities Working Group, CHCA Representative
and
Kirstin Blair, President
On behalf of the Crescent Heights Community Association

cc. Dale Calkins, Senior Policy & Planning Advisor, Ward 7
Renfrew Community Association
Rosedale Community Association
Capital Hill Community Association
Highland Park Community Association
Mount Pleasant Community Association
Tuxedo Community Association
Winston Heights/Mountview Community Association
Thorncliff Greenview Community Association
February 23, 2020

North Hill Communities Local Growth Planning Project
Box 2100, Station M
Calgary, AB T2P 2M5

Attention: Troy Gonzalez

RE: Draft North Hill Communities Local Area Plan

The Tuxedo Park Community Association has reviewed the subject plan as presented at the final working group session on February 18, 2020. We have several very serious concerns regarding the plan in its current form and ask for an extension until they can be addressed:

1. With the recent announcement of the realignment of the Green Line, we are very concerned about the intersection of 16th Avenue and Center Street North. The proposed realignment would have train traffic crossing the TransCanada highway at grade, disrupting traffic flow and traffic density. There is currently no plan for pedestrian traffic at this vital intersection.

2. Couple the increased train traffic and its pedestrians with the increased building scale around that intersection of allowable 26-storey residential/commercial buildings and the massive increase to pedestrian traffic that will create and 16th Avenue and Center Street becomes nearly impassable and extremely unsafe.

3. There is a dramatic increase in building scale with the resultant population density throughout the community that we don’t see in neighbouring communities.

4. This is very noticeable around the proposed 28th Ave. Greenline station location which is currently unfunded with no reasonable timeline to becoming funded. From Edmonton Trail to 1st Street NW is a block of high density with permitted six-storey buildings and 12-stories permitted on Centre Street. We believe this permitted use is premature and could be handled with an amendment to the plan at a later date when the Greenline station is closer to reality.

5. There is only minimal discussion of enhancement to the park at this location which is the only park in the community and a priority to the association. With higher density around the park and a possible c-train station next to it, this greenspace could quickly devolve into a crime hotspot if it isn’t properly developed.

6. We also know that any Main Street investment is currently at risk, we cannot support this densification on Edmonton Trail and Centre Street, without a serious thought as to why these streets act as barriers.

7. The rezoning along Edmonton Trail should be limited to the commercial lane as per the previous Main Street engagement.

With all these issues remaining outstanding and until there is a reasonable plan for the Greenline
as it enters Tuxedo Park, our community association cannot support the North Hill Communities Local Area Plan as it is currently written. We ask the City to take their time and do this right. The LAP has to be considered in conjunction with the Greenline realignment and the Main Streets project—both of which have been significantly—and negatively—changed and have yet to be approved by City Council.

I trust the foregoing is in order, please contact the undersigned at planning@tuxedoparkcommunity.ca for further information.

Anne Johnson
President, TPCA

Arnie Brownlees, Chair
Planning Committee, TPCA

Tuxedo Park Community Association
February 26, 2020

Attention: Troy Gonzalez
Senior Planner Community Planning
Planning and Development
City of Calgary

Re: North Hill Communities Local Area Plan community association feedback

Forty years have passed since the last city-led planning exercises to include all of Renfrew, the
North Bow Design Brief (1977) and the North Bow Special Study (1979). Consequently, the
Renfrew Community Association’s Planning Committee is pleased that the City has worked on the
North Hill Local Area Plan.

General Comments:

In general, we wish Council had approved the Guidebook for Great Communities before releasing
the draft North Hill Local Area Plan. The current plan to bring both to Council in close succession
exposes us to uncertainty from Council editing the Guidebook or delaying the North Hill Local
Area Plan. We are disappointed the Guidebook does not outline the low-density residential
district. Though we are more optimistic knowing that heritage tools are scheduled to go before Council
on the same day as the Guidebook and this Plan, we are disappointed that it has taken so long to create
those tools and there will be a period of risk while the tools are developed and applied in Renfrew.
We knew this was part of the risk of participating in the pilot project. We hope and will continue
to work eagerly to add those parts to the Guidebook and Land Use Bylaw so other communities
with future local area plans will have a complete Guidebook, a renewed Land Use Bylaw that
includes Floor Area Ratios, and enjoy the certainty that we do not.

It appears that the Plan directs more growth to Renfrew than to the other neighbourhoods in the
Plan area. We would expect to see similar levels of growth in all areas south of 16th Avenue.

This project began as “Local Growth Planning in North Central Green Line Communities”
(PUD2018-0347). We are concerned about the implications Green Line’s uncertainty and
timing will affect this Plan. What revisions will the Plan require if Council decides to add
stations or stop the Green Line south of the Bow River? After this high-level of engagement,
how would the Plan be revised? What would that process include? What would changing the
Green Line’s design on Centre Street mean for Edmonton Trail? In recent years, the Renfrew
Community Association has worked to make Edmonton Trail work better for area residents. We
enthusiastically support the Plan’s proposed implementation options for Edmonton Trail that build on past work and will continue to advocate for safe pedestrian crossings and infrastructure between Crescent Heights and Renfrew. We are concerned how Council’s decisions about the Green Line in the next few months would shape Edmonton Trail in ways that work against the Plan’s vision for one of our Main Streets.

The Guidebook and Plan seem to define “unique communities” by buildings with a higher intensity than the low-density district, public amenities, and public spaces. Some residents will likely be uncomfortable with this definition, and the low-density district in general.

Given the extent of growth that is possible in Renfrew, we suggest maintaining Renfrew’s unique character with a design guideline for buildings outside the Neighbourhood Housing – Local district to encourage references to Renfrew’s past and existing structures. New buildings could rhyme with their antecedents while also being palpably different. Possible methods could be using historic names (like naming a condo ‘The Rutledge’ if it has a view of the hangar, or ‘Arlington’ which was a proposed name for Renfrew), materials (like the metals on our churches’ domes or touches of brick or sandstone), or shapes (like using a curved awning to play on the curve of the hangar’s roof).

Without heritage tools in place prior to approval, both the Plan and Guidebook are incomplete and should not receive third reading at Council. Heritage matters in Renfrew. Because Renfrew was initially developed over decades (from the first decade of the twentieth century to the 1950s) and redeveloped incrementally afterwards, our built forms are a unique physical record of Calgary’s suburban development over the last century. We lament that the Plan and Guidebook for Great Communities have not discussed heritage in any specific or meaningful way. Words like "encourage" and "exploit" used in conjunction with Heritage Resources in the Guidebook do not compel anyone to act in this regard. The Guidebook also discourages copying or mimicking the design of heritage buildings in the area. We value new construction that seamlessly fits into its context. Our fundamental heritage questions remain unanswered. How will the Plan preserve heritage and make heritage preservation economically viable in Renfrew?

The Plan directs growth into Renfrew along some of our busier streets rather than being exclusively along Edmonton Trail and 16th Avenue. We feared that a more Main Streets-focused approach would put taller buildings along Edmonton Trail and transition down to 6th Street. It could have been from twelve storeys on the 400 blocks of each avenue, to six storeys on both the 300 and 600 blocks. The proposed Plan opens the possibility of preservation in the historic pre-World War I subdivisions of Regal Terrace and Beancroft between Edmonton Trail and 6th St NE.

Renfrew’s planning committee, board, and community members have a range of opinions about the Neighbourhood Housing – Minor areas within the neighbourhood. Some people wish growth was kept exclusively along Main Streets, like other neighbourhoods have done. Others are pleased to see the next level of growth directed about amenities like parks and schools. Some people find the proposed fourth-storey stepback appropriate. Others would like a four storey maximum. Others would like those areas retained as Neighbourhood Housing – Local with a three storey maximum.

A major concern about taller, more intense areas, whether along Main Streets or within the neighbourhood, is how they transition over time. We fear speculation, land swaps, and decay. Consequently, we do not want a Plan that encourages decades of decay. Correspondingly, we
question the wisdom of Policy 2.6.4, and other City policies and bylaws that encourage lot consolidation, discourage fine-grained urbanism, and raise the bar to entry.

For over a century, Renfrew's land uses have mixed in natural and normal ways that make a neighbourhood. We hope the Guidebook and Plan will continue to allow uses to mix beyond the difficult-to-finance mixed-use districts. We are pleased to see a mix of commercial is allowed in each Urban Form Classification, especially within Neighbourhood Housing – Minor. Residents and applicants may misinterpret housing areas (of any activity level) as excluding these appropriate commercial uses, though the Guidebook states Neighbourhood Housing – Limited "are areas will be primarily residential at various scales, and may support commercial uses that primarily serve people living in the immediate area, such as a barber shop or small convenience store" (Guidebook, pg 49). We gladly support any actions that makes this policy clearer. One solution could be adding commercial modifiers like "Commercial Cluster" or "Commercial Flex" to the Plan. Another would be editing the Guidebook to remove any confusion and add clarity to how much flexibility is possible in each urban form category and in this Plan.

*Comments about specific policies proposed in the North Hill Local Area Plan:*

We are pleased to see General Policy 2.5.2 added for shadow studies adjacent to parks. If there is any confusion about this policy, we suggest it be phrased to more explicitly include buildings across from parks as well. This seems like a reasonable rule for all development above six storeys adjacent to or across the street from parks. We suggest this be added to the Guidebook because we anticipate most residents will ask for a shadow study in those locations anyway. A policy that helps applicants be prepared for engagement will keep applications moving, which avoids needless delays and further inflating future residents' house prices.

We are glad to see General Policy 2.5.4 about retaining existing mature vegetation. We note that even with tree protection measures, development often damages root systems and kills trees. Developers often pay Urban Forestry for the trees' value without replacing trees. As trees age, it may be better to replace trees during development than removing them later without replacement. We would suggest adding a requirement that applicants "will retain or, if necessary, replace per City tree planting standards."

Past versions have had overly specific policies about stormwater management features. We are glad to see broader references to stormwater, including "green stormwater infrastructure" (2.6.3b and 2.11.1a).

We are glad to see objectives to "protect … heritage," "support the protection and maintenance of the tree canopy on public and private lands," and "support the planting of trees using methods that will ensure the sustainability and longevity of new trees" (3.1, 3.15, and 3.16).

In section 4 (Implementation and Interpretation), we would like to see a date by which the Plan needs to be reviewed. The current plan is to review these documents every ten years or so. Depending on development, some will be reviewed sooner, and some will be reviewed later. It seems reasonable to require a review of this Plan by 2035 or 2040.
Comments in reference to the appendix:

In addition to the proposed Edmonton Trail improvements, we are pleased to see improvements to Beaumont Circus. Both of these build on Edmonton Trail Day and Beaumont Circus Block Party, ActivateYYC events that we hosted in 2018 and 2019.

Many of the policies and implementation options are north of 16th and west of Centre, while much of the non-main street growth is in Renfrew. We suggest some timing of the implementation options depend on where/when the growth happens. It would be disappointing if Renfrew’s growth benefited neighbouring communities, without helping Renfrew.

To repeat, we are thankful for the efforts that have gone into this project, for the willingness and enthusiasm we have had throughout this pilot, and the responsiveness we have seen to our feedback thus far. We hope our final few suggestions and comments will be received in the same spirit.

Sincerely,

Renfrew Community Association

David Barrett  
Vice-President – External

And

Nathan Hawryluk  
North Hill Communities Working Group – RCA Representative

cc:  
Ward 9 office  
Ward 7 office  
Crescent Heights Community Association  
Capitol Hill Community Association  
Highland Park Community Association  
Mount Pleasant Community Association  
Tuxedo Community Association  
Winston Heights/Mountainview Community Association  
Thorncliffe Greenview Community Association