



ATTN: Standing Policy Committee on Planning and Urban Development (PUD) Members

**RE: July 15 2020 Meeting of PUD
Item 7.2 Heritage Conservation Tools/ Incentives Update – PUD2020-0768
Item 7.3 Guidebook for Great Communities Referral - PUD2020-0721
Item 7.4 North Hill Communities Local Area Plan Referral – PUD2020-0739**

We are writing to express our position regarding the captioned topics: BRCA supports the Heritage Conservation Tools and Incentives Update Report, and would like to see both the Guidebook for Great Communities and the North Hill Local Area Plan referred for further work as Administration has recommended.

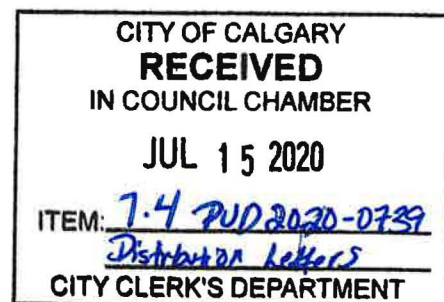
We also wish to record our appreciation for the fact that Administration has obviously listened actively and is now responding to comments from both stakeholders and councillors comments at the March 4, 2020 PUD meeting regarding these complicated topics, and also that there is now a willingness to further improve these important planning documents before these topics return to Council.

Also, as BRCA perceives there to be a lot of alignment between the further work now being recommended by Administration, and Councillor Carra's proposed approach and suggested amendments, we hope that synergies can be realized over the proposed work period, and that the best of both can proceed.

BRCA looks forward to the opportunity of considering the impacts for our community once the work is underway and outcomes are more clear.

**Ali McMillan
Planning Director**

PER: BRIDGELAND RIVERSIDE COMMUNITY ASSOCIATION BOARD OF DIRECTORS





Public Submission

City Clerk's Office

Please use this form to send your comments relating to matters, or other Council and Committee matters, to the City Clerk's Office. In accordance with sections 43 through 45 of Procedure Bylaw 35M2017, as amended. The information provided may be included in written record for Council and Council Committee meetings which are publicly available through www.calgary.ca/ph. Comments that are disrespectful or do not contain required information may not be included.

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- * I have read and understand that my name, contact information and comments will be made publicly available in the Council Agenda.

* First name **Greg**

* Last name **Brown**

Email **gbrown@bapg.ca**

Phone **4035124180**

* Subject **North Hill Communities Local Area Plan (PUD2020-0739) at PUD July 15, 2020**

* Comments - please refrain from providing personal information in this field (maximum 2500 characters) **See enclosed email and associated two attachments.**



From: [Greg Brown](#)
To: [Grant Mihalcheon](#)
Cc: [Greg Brown](#)
Subject: Fwd: North Hill Communities Local Area Plan at PUD July 15, 2020
Date: July 13, 2020 9:56:31 AM
Attachments: [Attachment Two.docx](#)
[ATT0001.htm](#)
[Attachment One.docx](#)
[ATT0002.htm](#)

Grant this is the email and attachments I want to send to City Clerk for Wednesday PUD meeting.

Sent from my iPad

Begin forwarded message:

From: Greg Brown <gbrown@bapg.ca>
Date: July 7, 2020 at 14:47:07 MDT
To: Debra Hamilton <debra.hamilton@calgary.ca>, "troy.gonzalez@calgary.ca" <troy.gonzalez@calgary.ca>
Cc: "ajay@ambleventures.com" <ajay@ambleventures.com>, Greg Brown <gbrown@bapg.ca>, Vern Hart <vhart@bapg.ca>
Subject: Fwd: North Hill Communities Local Area Plan at PUD July 15, 2020

Good afternoon Debra. Thank you for your reply to my email in which we confirmed our serious concerns about the proposed North Hill Communities Local Area Plan.

We remain very concerned that the proposed NHCLAP provides absolutely no recognition of the urban form, building scale and comprehensive multi-family community development set out in the Direct Control bylaws for the Highland Park Golf Course land approved by Council in 2017. In our view, an area redevelopment plan should reflect recently approved, comprehensive Council plans. We know of no Council policy changes justifying the failure to recognize Council's 2017 comprehensive plans for HPGC.

Beyond not recognizing this recent Council approval, the draft Plan is clearly inconsistent with, and contradicts, the Council-approved redevelopment plan for HPGC (specifics of these contradictions and inconsistencies are contained in my detailed report to you forwarded June 2nd 2020, further copy attached). I am also appending a further attachment reflecting the specific changes which we believe are necessary to address our concerns. Perhaps most important is the indication in the draft Plan that "...significant stormwater and drainage challenges exist on the site...". There are no onsite drainage problems associated with the Council-approved Plan. That plan can be developed while addressing both its own stormwater as well as enabling the City to transmit its upstream stormwater through the site. That proposition was repeatedly confirmed to Council by Water Resources in the public hearing which led to the approval of the proposed development plan.

Both your email and the draft Plan reference the Regional Drainage Study (i.e. the Confederation Park Study Final Report (2019)). Could you please pass along to me the documentation by which this study was approved or adopted by the City?

We also mentioned in our note to you that City Council has recently directed Administration (REDS) to enter into discussions to acquire the HPGC lands. Those discussions are continuing. Importantly, the MGA requires that an area redevelopment plan "must describe" any proposals for acquisition of land for any municipal use. Section 635 of the MGA says, "An area redevelopment plan (a) must describe....(iv) any proposal for the acquisition of land for any municipal use." In all of the circumstances, it seems sensible to us that the Council's direction be included in the NHCLAP.

Finally, would you please confirm that our position as stated above (along with the attachments) will be included in the PUD agenda for its hearing on July 15th? If you are unable to do so, we will provide a copy directly to PUD members. We will be making submissions to PUD in support to the extent that we are able. Thank you.



Attachment one

NORTH HILL COMMUNITIES LOCAL AREA PLAN- HIGHLAND PARK DEVELOPMENTS LP

INTRODUCTION

This letter is written on behalf of our clients, Ajay Nehru and Highland Park Developments LP, owners of the former Highland Park Golf Course lands (HPGC lands).

City Council gave three readings to several Direct Control bylaws for the HPGC lands in March 2017. See attached DCs. Prior to this approval, and extending over a period of 4 years, the HPGC lands were the subject of extensive developer, Administration, resident/community and Council discussion, deliberation and decision making (including two public hearings). Through these extensive processes, the urban form and building scale were carefully and clearly determined. Council's decisions resulted in approval of a complete community involving a variety of multi-family dwelling types, community commercial and open space for active and passive uses.

While we have continued to be in discussions with the City over the last two and a half years about the HPGC lands, the Confederation Park Regional Drainage Study (Drainage Study) and the potential completion of the City's purchase of all or a portion of the HPGC lands, we have only recently become aware of the Proposed North Hill Communities Local Area Plan (NHCLAP). The NHCLAP is apparently intended to become an Area Redevelopment Plan affecting a very significant portion of north-central Calgary, south of John Laurie Boulevard including the HPGC lands. It "provides the long term vision specific to the North Hill Communities and articulates a broad strategy for accommodating community growth and change. Community specific policies related to land use planning and development matters are also included" (Section 1, page 5). We do not understand why we did not receive any notice about this entire process despite it having been underway since Fall 2018 and it having gone to SPC PUD on March 4, 2020.

The Proposed NHCLAP provides no recognition of the urban form, building scale and comprehensive multi-family community development set out in the DC bylaws approved by Council for the HPGC lands. It also does not recognize the extensive policy guidelines in the Highland Park Green Design Guidelines adopted by Council to address the redevelopment of the HPGC lands and the specific concerns of the residents in the adjacent Highland Park community and surrounding communities. These are likely the most extensively planned redevelopment lands in the entire NHCLAP area.

SPECIFIC PROBLEMS WITH NHCLAP

Beyond not recognizing the Council-approved community plan for the HPGC lands, the NHCLAP is clearly inconsistent with and contradicts the Council-approved plan. A few key examples are the following:

1. Map 3: Urban Form shows the HPGC lands site as Comprehensive Planning Site as if it still needs future planning. As shown above it has already been comprehensively planned.
2. Map 4: Building Scale shows "no scale modifier" to indicate the proposed intensity-for the lands. This is completely inconsistent with what was recently approved by Council.
3. Section 2.5 General Policies contains a specific Note 11 referencing the HPGC lands. It indicates that "The Plan recognizes that significant stormwater and drainage challenges exist on the site as identified in the Confederation Park Regional Drainage Study Final Report (2019)" (Page 31).

This statement is incorrect. There are no onsite drainage problems associated with the Council-approved plan. Our stormwater engineers indicate the Council-approved development plan can be safely developed while addressing its own stormwater as per City policies as well as enabling the City to transmit its upstream stormwater through the site. Importantly, this proposition was repeatedly confirmed to Council by Water Resources in the public hearing which led to approval of the proposed plan.

As a consequence of stormwater upstream of the HPGC lands, the Drainage Study recommended that the City use and complete the acquisition of the HPGC lands to store the upstream stormwater even though there were other options available to the City that did not require the HPGC lands. The owners do not agree with the Drainage Study's recommendations. However, subsequently City Council directed Administration to enter into discussions with the owners of the HPGC lands to complete the acquisition of those lands but no agreement has been reached. The City's processes determining whether it required some or all of the HPGC lands, have already significantly delayed the owner's development of the lands. To the extent that an agreement is not achieved in the near term, the owners will be proceeding with the development of the Council-approved plan.

Rather than incorrectly referencing "drainage challenges existing on the site" the Note should be amended to reference the Drainage Study recommendation for the City to use and complete the formal acquisition of the HPGC lands to store upstream stormwater.

4. Appendix A of NHCLAP contains an Implementation Option (What we heard), which reads, "Explore opportunities to provide additional Park space and walking and cycling connections through the former Highland Park Golf Course lands." The approved HPGC development plan contains approximately 20% open space, a large Central Park, comprehensive linear open space for walking and cycling and connections to the adjacent communities. Any additional open space lands would have to be purchased and the approved development plan amended. This suggestion must be put into context with what Council has already approved for the HPGC lands.

CONCLUSION

The NHCLAP must be amended to accurately reflect the land uses, urban form and building scale recently approved by Council for the HPGC lands.

As mentioned above, what has not been determined is whether City will complete the formal acquisition of the HPGC land to store the upstream stormwater. Until it does so, the currently approved land uses and plan for the HPGC lands should be properly reflected in the NHCLAP.

Attachment Two

PROPOSED AMENDMENTS TO THE NORTH HILL COMMUNITIES LOCAL AREA PLAN by Brown and Associates Planning Group on behalf of Highland Park Developments LP

Our recommendations for amendments to the Proposed NHCLAP would reflect the carefully considered land use and policy decisions of Council in 2017. Our recommended amendments are as follows;

1. Map 3: Urban Form - Amend from "Comprehensive Planning Site" to "Neighbourhood Housing Minor/Major" west of Centre Street and "Neighbourhood Commercial Major" east of Centre Street.
2. Map 4: Building Scale - Amend from "No scale modifier" to "Low/Mid Scale" west of Centre Street and "High Scale" east of Centre Street.
3. Section 2.5 General Policies amend from Note 11 : Map 3: Urban Form identifies the lands on and around the former Highland Park Golf Course as a Comprehensive Planning Site. The Plan recognizes that significant stormwater and drainage challenges exist on the site as identified in the Confederation Park Regional Drainage Study Final Report (2019). In addition to the policies for Comprehensive Planning Sites set out in the Guidebook, the following guiding principle applies to the site: a. Provide pedestrian /bicycle connections to the City's network of pathways and bicycle network " to "Note 11 : Map 3 ; Urban Form identifies the lands on and around the former Highland Park Golf Course as Neighbourhood Housing Minor/Major west of Centre Street and Neighbourhood Commercial Major east of Centre Street. This urban form was approved by Council in 2017. Subsequently the City completed the Confederation Park Regional Drainage Study Final Report (2019). The Final Report recommends the City purchase all or a portion of the site to help handle the projected future stormwater flow from the regional drainage basin. Purchase of all or a portion of the site by the City would result in the need for an amendment to the approved plans. Any amendments to the plans as a result of a purchase by the City shall retain pedestrian/bicycle connections to the City's network of pathways and bicycle network."



THE CALGARY HERITAGE INITIATIVE GIVES CONSENT TO THE CITY OF CALGARY TO PUBLIC DISTRIBUTION OF THIS LETTER AND ATTACHMENTS BY ANY METHOD.

July 14, 2020

Re: July 15, 2020 City of Calgary SPC on Policy and Urban Development

7.4 North Hill Communities Local Area Plan (NHCLAP) Referral for Additional Direction, PUD2020-0739

Dear Members of PUD

The Calgary Heritage Initiative, known as CHI, is a volunteer society dedicated to the preservation, productive use, and interpretation of buildings and sites of historic and architectural interest in our city. Heritage communities contribute to the economic and environmental sustainability of our city and the social wellbeing of our citizens. They create a sense of place. Over the past couple of years, CHI actively participated as a heritage stakeholder in the Guidebook for Great Communities and related Heritage Conservation Tools and Incentives Report engagement processes, and has closely followed the development of the NHCLAP as it is the pilot for future LAPs that draws from the latter 2 documents.

CHI supports Administration's recommendation "to revise the proposed North Hill Communities Local Area Plan as outlined in Attachment 2 and Attachment 3, and to return to the SPC on Planning and Urban Development no later than 2021 January, in conjunction with the Guidebook for Great Communities." In particular, we support further work on the proposed revision: item 3 "Local historical context and character".

The NHCLAP should not be recommended for Council approval by PUD until it's known what heritage tools and incentives will be adopted by the City. Residents and stakeholders need to evaluate whether they think the tools will be effective enough to retain heritage – and whether the incentives will be enough to offset all of the extra density being ascribed to the area. Otherwise we will have a LAP that has supportive policy of upzoning but with no or insufficient tools to offset the density for heritage sites.

The NHCLAP does not contain provision for implementing heritage density bonusing or transfer. It's a missed opportunity, like giving away density for free, which we know has immense value. It leaves money on the table that could be used for community benefit such as heritage grants or program funding, or to enable a density transfer program for houses, as could have been done for buildings like the Tiegerstadt Block, Hicks Block and others. The modest grants available now and measures like

property tax relief help do impact heritage retention, but we know that City resources to provide community benefit are strained.

The NHCLAP has identified some areas of high concentration of heritage sites in section 2.13 and Appendix C. This partially addresses the timing challenge regarding the pending heritage area districting policy. However, there are many resources outside the boundary/ concentration in North Hills that will be under policy supportive of town houses and row house development. Funds are going to be needed to encourage their owners to retain homes and influence the retention of other heritage resources. Bonusing could supply those funds and give owners of heritage building opportunity to recoup economic value rather than redevelop by allowing them to sell their density.

Clarification of how the proposed layers (as described in the Heritage Conservation Tools and Incentives Report) apply to heritage areas in North Hills is requested, because the identification of layers is dependent on block faces of private buildings. It remains unclear as to how other heritage resources (streetscape, cultural landscapes, parks, institutional, industrial and commercial buildings and Mainstreets) could be incorporated into heritage area boundaries for these communities. CHI understands that much of the detail, including boundaries for heritage policy areas should be defined at the LAP stage, and that these other heritage resources may be conserved by additional tools.

CHI suggests that work be done to demonstrate more clearly how the layers apply to defining heritage areas using the draft North Hill Communities Plan as a tangible example. The windshield survey and proposed Heritage Policy Areas in the Heritage Conservation Tools and Incentives Report do not completely align with the “bubbles” in the North Hill Communities Plan (Attachment 2 to PUD2020-0164). It is suggested that the heritage areas be worked through in more detail with the communities, because local knowledge is essential to the “Identify, protect, manage” conservation approach and also to interpret conserved and lost heritage resources. For example, the community of Renfrew-Regal Terrace already had Statement of Significance prepared. It would also be useful to consider and describe where existing DCs have some benefit for heritage conservation. For example, the City of Edmonton officially recognized the historic significance of the Westmount Architectural Heritage Area in 1997 and implemented a Direct Development Control (DC1), which is similar to layer 3. If applicable, The SOS, existing DC’s and possibly areas where historic caveats apply, should be considered in the identification of heritage areas and boundaries for all future multi-community LAPs and this directive should be spelled out in the Guidebook for Great Communities.

Given that the North Hill Communities Plan is the pilot LAP under the new Guidebook and will direct future LAPS, stakeholder representatives from the Calgary Heritage Initiative and other stakeholder groups beyond the affected communities, like Calgarians for Heritage Districts, would be pleased to participate in this process.

Karen Paul

CHI Communications Director

On behalf of the Calgary Heritage Initiative Society

contact@calgaryheritage.org



Public Submission

City Clerk's Office

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* I have read and understand that my name, contact information and comments will be made publicly available in the Council Agenda.

* First name **Simonetta**

* Last name **Acteson**

Email **parks@crescentheightsyyc.ca**

Phone **4038040372**

* Subject **North Hill Communities Local Area Plan**

* Comments - please refrain from providing personal information in this field (maximum 2500 characters) **Please see attached letter on behalf of the Crescent Heights Community Association.**



July 12, 2020

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

Standing Policy Committee on Planning and Urban Development (PUD)
reference item # PUD2020-0739

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

We respectfully include our previous letter stating our concerns with the Local Area Plan (LAP) draft from January 30th, 2020 to this submission. For the reasons listed in our letter from January 30th, 2020 (below) and February 25th, 2020, the Crescent Heights Community Association does not support the North Hill Communities – Local Area Plan – Final Proposed Plan as drafted and submitted for the March 4th PUD.

We support the current submission by administration recommending:

That the Standing Policy Committee on Planning and Urban Development recommend that Council direct Administration to revise the proposed North Hill Communities Local Area Plan as outlined in Attachment 2 and Attachment 3, and to return to the SPC on Planning and Urban Development no later than 2021 January, in conjunction with the Guidebook for Great Communities.

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. It is in the best interests of all involved that this Plan be the best it can be. We feel that together we can work towards a plan that will satisfy our community needs and the direction the city is working towards.

We are pleased to see that the recommended revisions include changes that, at minimum, move the plan in directions we have requested. We would like to take this opportunity to comment on some of the proposed revisions.

1. Alignment with the Guidebook

We had specifically asked (under #2 in our previous letter) that the plan follow the direction laid out in the Guidebook (section 2.29). Though we see some movement in this direction, it is hard to estimate how much of this will occur with the noted changes being proposed. The Guidebook sets out a direction for what should be included in a Local Area Plan and we continue to encourage administration to follow those directions as listed. We consider the current draft plan to be lacking in detail and feel that additional details will help the communities involved and provide a usable tool for industry, residents, and community associations.

2. Alignment with approved Greenline

We are pleased to see that the impact and considerations of an approved Greenline will be included in the plan. As a community that will be significantly altered by the addition of Greenline we feel that this is very important, especially as it relates to mobility and TOD related development. We would like to stress that

our vision for the 9th avenue station is as a community or village scale station, unlike the TOD requirements for 16th Avenue N. In conversations with both the Greenline team and the LAP team, we believe we hold similar views for the expectations for the station and its surroundings. We look forward to working with the teams and our BIA to develop the best solutions for this station.

3. Local historical context and character

We are encouraged by the direction of the Heritage Policy Tools and Financial Incentives work and hope that the application and alignment of these tools with the plan will address some of our community's concerns with maintaining character in heritage rich areas of our community.

4. Urban Tree Canopy

As an issue that we have repeatedly wanted policy strengthened and given more weight, we are pleased to see that this is an issue identified for revisions and improvements. This is an area that is firmly aligned with city policies for "Greening the City" which will help with sustainability, resilience, and benefit residents on multiple levels. We include below our main requests for protecting and increasing the tree canopy:

- 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.

5. Opportunities for place making and public realm improvement

We look forward to seeing how this revision will be addressed in the plan and welcome the opportunity to see public realm improvements.

6. Parks and Open Space Frontages

We are pleased to see that park frontage will be further addressed. As expressed previously, we continue to have concerns over a lack any policy to address how our parks and amenities will survive and flourish as a significantly larger population accesses these resources. As previously written: "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."

It is our firm request that these suggestions be considered in the revisions.

7. Commercial Clusters, Neighbourhood Activity Centres, and mixed-use streets

Since we are unsure of what this will look like in the plan and how it will relate to our community, we have no direct comments on this, but hope that it will be developed with community input and meet all associated needs.

8. On-street parking

We recognize the need to address these issues either in the plan or at the Guidebook level and look forward to finding solutions that will work for our community without putting undue pressure on residential parking needs.

9. Mobility corridors

We spoke of this in our previous letter as being missing from the draft plan and are pleased to see it being listed as a proposed revision. With the approved Greenline, mobility in, around, and through our community will be a major area for us to have addressed in a comprehensive and thoughtful way. We look forward to further community engagement on this as plans develop.

10. Road rights-of-way setbacks

Opportunities to increase public realm improvements are welcomed by our community and we look forward to seeing the identification of possible locations and policy to encourage this practice.

11. Guidebook – Urban Form Classification System

Since the changes alluded to are unspecified as of now, we will wait to see what is being proposed. We look forward to an opportunity to work with administration through any changes proposed.

Again, we would like to express our support for administration that revisions to the draft plan be considered by council and support the revised timelines being proposed.

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 of 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 neighbourhoods.”

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

Thornclyff Greenview Community Association