

**POLICY AMENDMENT AND LAND USE AMENDMENT  
BRIDGELAND/RIVERSIDE (WARD 9)  
NE CORNER OF 11A STREET NE AND 2 AVENUE NE  
BYLAWS 7P2016 AND 36D2016**

**MAP 23C**

**EXECUTIVE SUMMARY**

This application is for the Bridgeland School site in the community of Bridgeland. The purpose of this application is to allow for legal protection and designation of the historic portion of the Bridgeland School as a Municipal Historic Resource and to allow portions of the site to be developed into multi-residential dwellings. The school is listed as a City Wide Historic Resource on the Calgary's Inventory of Historic Resources. This application contains the following components:

1. Designation and legal protection (by separate bylaw) of the historic portion of the Bridgeland School as a Municipal Historic Resource;
2. A site specific amendment to the Bridgeland-Riverside Area Redevelopment Plan (ARP) in support of the land use redesignation;
3. Redesignation of the site to Multi-Residential – Contextual Low Profile (M-C1) District and Direct Control District to allow for back-to-back townhouses and the adaptive re-use of the Bridgeland School for community purposes; and
4. A concurrent development permit (DP2015-2867) to allow for the back-to-back townhouses and the demolition of the non-historic portions of the school building. Information about the development permit is included within this report.

**PREVIOUS COUNCIL DIRECTION**

None

**ADMINISTRATION RECOMMENDATION(S)**

2016 January 14

That Calgary Planning Commission recommends **APPROVAL** of the proposed Policy Amendment and Land Use Amendment.

**RECOMMENDATION(S) OF THE CALGARY PLANNING COMMISSION**

That Council hold a Public Hearing on Bylaws 7P2016 and 36D2016; and

1. **ADOPT** the proposed amendments to the Bridgeland-Riverside Area Redevelopment Plan, in accordance with Administration's recommendation; and
2. Give first and second readings to the proposed Bylaw 7P2016; and

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3. **WITHHOLD** third reading pending Municipal Historic Designation of the site or until any other mechanism to ensure such designation is in place.
4. **ADOPT** the proposed redesignation of 0.63 hectares  $\pm$  (1.55 acres  $\pm$ ) located at 414 – 11A Street NE (Plan 0312887, Block 140, Lot 34) from Special Purpose – Community Institution (S-CI) District to Multi-Residential – Contextual Low Profile (M-C1) District and DC Direct Control District to accommodate community uses while preserving the historic portion of the Bridgeland School, in accordance with Administration’s recommendation; and
5. Give first and second readings to the proposed Bylaw 36D2016; and
6. **WITHHOLD** third reading pending Municipal Historic Designation of the site or until any other mechanism to ensure such designation is in place.

**REASON(S) FOR RECOMMENDATION:**

The proposed development supports the goals of the Municipal Development Plan (MDP) and provides an appropriate scale of development and intensity within the context of the community of Bridgeland. The existing streets and open space provide an appropriate transition area from low density development to the proposed medium density development.

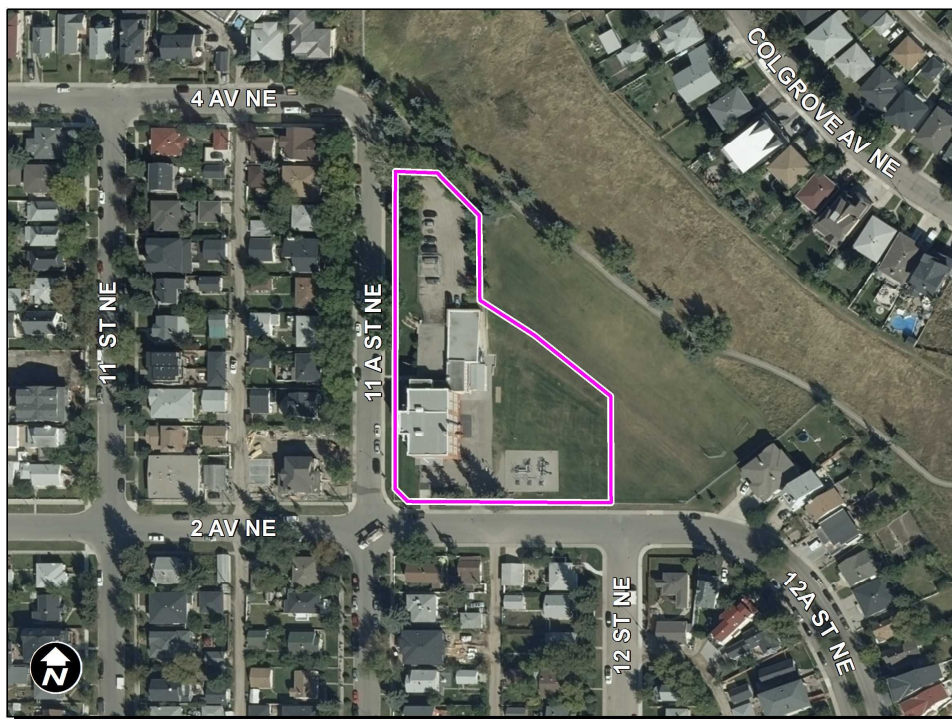
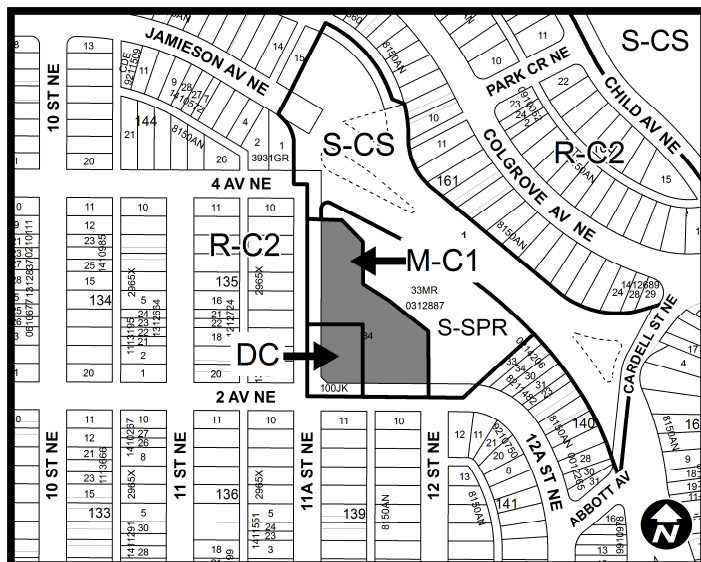
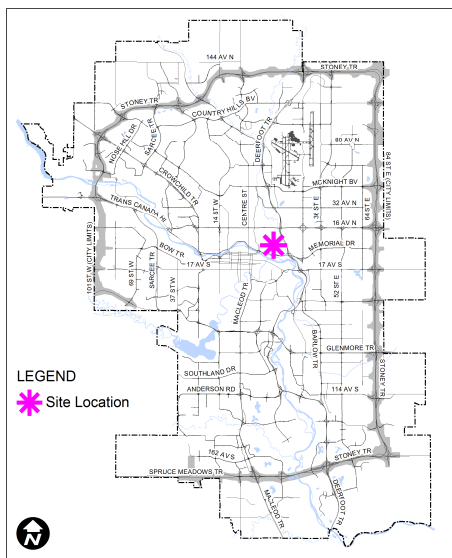
**ATTACHMENTS**

1. Proposed Bylaw 7P2016
2. Proposed Bylaw 36D2016
3. Public Submission

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LOCATION MAPS



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**ADMINISTRATIONS RECOMMENDATION TO CALGARY PLANNING COMMISSION**

1. Recommend that Council **ADOPT**, by bylaw, the proposed amendments to the Bridgeland-Riverside Area Redevelopment Plan (APPENDIX II).
2. Give first and second readings to the proposed Bylaw; and
3. **WITHHOLD** third reading pending Municipal Historic Designation of the site or until any other mechanism to ensure such designation is in place.

**Moved by: M. Foht**

**Carried: 6 – 0**

Absent: S. Keating, R. Wright and M. Logan

4. Recommend that Council **ADOPT**, by bylaw, the proposed redesignation of 0.63 hectares ± (1.55 acres ±) located at 414 – 11A Street NE (Plan 0312887, Block 140, Lot 34) from Special Purpose – Community Institution (S-CI) District to Multi-Residential – Contextual Low Profile (M-C1) District and DC Direct Control District to accommodate community uses while preserving the historic portion of the Bridgeland School with guidelines (APPENDIX IV).
5. Give first and second readings to the proposed Bylaw; and
6. **WITHHOLD** third reading pending Municipal Historic Designation of the site or until any other mechanism to ensure such designation is in place.

**Moved by: M. Foht**

**Carried: 6 – 0**

Absent: S. Keating, R. Wright and M. Logan

Reasons for Approval from Ms. Wade:

- Support the discretionary uses. Important to have offices and restaurant services to support both residents and public.
- Gateway to Tyndale Park and pathway system, great place to meet and gather.
- Good use of land to address housing condition of the neighbourhood by providing a housing unit that can support families.
- Opportunities for public art.
- Consider dogs in the landscape plan at development permit. (ie. Dog park area, dog waste bag dispensers and garbage bins)
- Placement of building blocks to address site topography could be reviewed to achieve better private amenity space on units and connections to open space to eliminate retaining walls. Stepping buildings more frequently and lowering parking platform may address the site more sensitively – perhaps this can be considered at the development permit.



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Reasons for Approval from Mr. Friesen:

- I supported this Land Use as a good way to support the reuse of a historic school building and also because unlike other inner city older communities Bridgeland appears to have a relatively high percentage of open space. The loss of this site as open space would not compromise the community a great deal.

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**AMENDMENT:** Amend DC guideline “7(k)” delete “Restaurant: Licensed – Small” and insert “Restaurant: Food Service Only – Small”

**Moved by: J. Gondek**  
Absent: S. Keating, R. Wright  
and M. Logan

**LOST: 1 – 5**  
Opposed: G. Morrow, M. Wade,  
C. Friesen, G.-C. Carra  
and M. Foht

**AMENDMENT:** Amend DC guidelines to limit the size of the discretionary Office use in the plan to 10 percent of the square footage of the building.

**Moved by: J. Gondek**

**WITHDRAWN**

**MOTION:** The Calgary Planning Commission **DIRECTS** Administration to bring the concurrent development permit associated with LOC2014-0161 to Calgary Planning Commission for final recommendation.

**Moved by: M. Wade**  
Absent: S. Keating, R. Wright  
and M. Logan

**Carried: 4 – 2**  
Opposed: J. Gondek and M. Foht

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**Applicant:**

O2 Planning and Design

**Landowner:**

Delta West Academy Society

**PLANNING EVALUATION**

**SITE CONTEXT**

The subject site is located in the northeast corner of the community of Bridgeland at the corner of 11A Street NE and 2 Avenue NE. The site contains the Bridgeland School built in 1921. The building is a two storey brick Modern Classical style that has since had additions added throughout the years. The site has been in private ownership since 2004. In 2003 municipal reserves were subdivided off the property and are located east of the site called Tyndale Park. Tyndale Park and the school site are at the bottom of the escarpment that separates the communities of Renfrew and Bridgeland.

The site currently contains the two storey Bridgeland School building, a surface parking lot and playground. Eighteen trees are located on the property. The site is relatively flat along 2 Avenue NE sloping up to Tyndale Park. The site slopes up from 11A Street NE, then a flat parking area and then continues to slope up to Tyndale Park.

The surrounding area consists of low density residential development designated Residential – Contextual One/Two Dwelling (R-C2) District in the form of single-detached, semi-detached, and duplex dwellings. The site is an approximately 12 minute walk from the Bridgeland/Memorial CTrain Station.

**LAND USE DISTRICTS**

The applicant proposes to redesignate the site from Special Purpose – Community Institution (S-CI) District to Multi-Residential – Contextual Low Profile (M-C1) District and DC Direct Control District to accommodate community uses within the historic Bridgeland School.

The Direct Control District is based on the Special Purpose – Community Service (S-CS) District with the addition of other community type uses such as social organization, event facility and instructional facility. A Direct Control District was used to allow for the preservation and adaptive reuse of the Bridgeland School. Many of the uses in the Direct Control District are the same as those within the existing S-CI district.

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**DEVELOPMENT PERMIT**

Site Layout & Building Design

The residential buildings are designed as three storey back-to-back townhouses with direct access to grade from each unit and direct access from the parking garage to each unit as indicated in APPENDIX VI. The units along the street each have connections directly to the public sidewalks. The buildings are of modern architecture with front patios and third floor balconies to provide articulation. The ends of the buildings adjacent to Tyndale Park provide visual interest through articulation and a mix of exterior finishing breaking up the façade. Surveillance of the park is provided by windows from the end units. The buildings are set back from the street approximately six metres due to a historic setback caveat on title. Due to the sloping nature of the site, the street oriented units all contain a significant set of stairs to the front entrances. Each unit consists of three bedrooms.

The exterior finishes consist of masonry veneer along the majority of the first storey and vertically at the edge of each unit. The finishes also consist of composite siding, prefinished windows and doors, prefinished metal, glass railings, and smooth faced fibre cement panel.

Landscaping

The development proposes a mix of coniferous and deciduous trees and shrubs on the subject site. Brandon Elms will be planted in The City boulevard to improve the existing streetscape. A mix of shrubs will be planted in the front of each unit. Green roofs will be provided over the waste and recycling area and electrical and water metre rooms. A native grass mix is used in the central amenity area. A gravel pathway and stairs provide access through the amenity to Tyndale Park. A drought tolerant sod is used along the front of the buildings. All landscaped areas will be irrigated by a high efficiency system.

**LEGISLATION & POLICY**

Municipal Development Plan (MDP)

The subject site is designated as Inner City in the Developed area. New development should support the revitalization of local communities by adding population, is provided in a form that respects the scale and character of the neighbourhood, and provides a variety of housing types to meet the needs of future and present populations. A range of intensification strategies, such as parcel-by-parcel intensification to larger more comprehensive approaches should be used.

Owners are encouraged to conserve and re-use heritage buildings with The City using various tools and mechanisms to preserve historic resources.

Municipal Historic Resource Designation

The Bridgeland School is identified as a City Wide Historic Resource on The Calgary Heritage Authority's Inventory of Evaluated Historic Resources and therefore merits designation as a Municipal Historic Resource. Minto Communities, the future owner of the property, has agreed

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to allow this designation and a legal agreement will be prepared that will be required to be in place prior to Council's third reading of this ARP amendment and land use redesignation bylaws.

**Bridgeland-Riverside Area Redevelopment Plan (ARP)**

The site is currently designated as Open Space and a School on Figure 3 Generalized Land Use in the ARP. To update the ARP and support the proposed redevelopment of the site, an ARP amendment is contained in APPENDIX II. The policy amendment allows for the adaptive reuse of the Bridgeland School for community uses such as artist studios, child care facility, school, and performing arts centre. In addition, the policy amendment allows for the remainder of the site to be developed into a low rise multi-residential development containing 39 units. To help provide more certainty for the public and developer, and align with the proposed development permit, the ARP amendment has included the height and dwelling unit limits from the development permit.

**TRANSPORTATION NETWORKS**

A Transportation Impact Assessment was not required as part of this application. Vehicular access for the site is provided by a one way Woonerf going into the site from 11A Street NE and exiting onto 2 Avenue NE westbound. The exit onto 2 Avenue NE coincides with the existing driveway location. A directional exit has been provided to eliminate left turn conflicts with the lane across 2 Avenue NE. A Woonerf has been provided instead of a drive aisle to help calm traffic provide for shared pedestrian facilities. 11A Street NE and 2 Avenue NE contain sidewalks on both sides of the street along the subject site.

The proposed 39 residential units require 39 residential parking stalls and six visitor stalls. Each unit has a dedicated parking stall provided in the underground parking garage for each building. The six visitor stalls and one accessible stall have been provided on the surface along the eastern side of the Woonerf.

The site is located in close proximity to the Bridgeland/Memorial C-Train Station, the river regional pathway system and Memorial Drive SE providing multiple modes of transportation.

**UTILITIES & SERVICING**

A Sanitary Servicing Study was submitted and approved by Water Resources.

Existing servicing for the heritage building will remain. A new water service connection for the residential development will be from 2 Avenue NE. The proposed residential development will make storm and sanitary connections at 11A Street NE.

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**ENVIRONMENTAL ISSUES**

An Environmental Site Assessment was not required.

**ENVIRONMENTAL SUSTAINABILITY**

Environmental sustainability will be addressed at the development permit application stage. As part of the development permit a key sustainable strategy of this development is the retention and historic designation of the Bridgeland School. Some of the sustainability measures identified for this project include:

- Access to daylight, natural ventilation and views to the outside;
- Low VOC, recycled and sustainable material selections;
- Water wise plumbing fixtures and energy wise lighting fixtures;
- The use of native and adaptive vegetation;
- High efficiency irrigation system; and
- Approximately 50 percent of the site will remain as open space.

**GROWTH MANAGEMENT**

There are no growth management issues.

**PUBLIC ENGAGEMENT**

**Community Association Comments**

The Bridgeland Riverside Community Association's comments are included in APPENDIX V. The community's land use comments are summarized below:

- 1) Maintain the current zoning for a school use or another compatible community amenity use.
- 2) The application represents a spot rezoning and is not aligned with the ARP.
- 3) The maximum height is not supported.
- 4) The restaurant and retail component may be of some concern to adjacent neighbours.

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Bridgeland Riverside's comments have been addressed as follows:

- 1) The heritage building is proposed to be redesignated to Direct Control based on the Special Purpose – Community Service (S-CS) District. Some of the Direct Control District is similar to the land use for the King Edward heritage building and most of the uses in the current S-CI district have been maintained. Schools and other community uses would be able to continue within the heritage building.
- 2) This application includes an amendment to the Bridgeland-Riverside ARP that would align the proposed land use with the ARP. The proposed site is being redeveloped comprehensively.
- 3) The subject site is not immediately adjacent to any existing residential properties and therefore Administration is satisfied there is an appropriate buffer and transition to the proposed building heights. The north half of building one follows the existing grade and is approximately 12.5 metres in height from grade. The south half of building one steps down but is raised above the existing grade due to the underground parking and the existing sloping up to Tyndale Park. Building two is also challenged by the underground parking and the existing sloping up to Tyndale Park. Additional height to the heritage building allows for some flexibility for additions.
- 4) The restaurant use is limited to the small size to provide for the possibility of a café. The retail use has been limited to be provided in conjunction with another use such as a performing arts centre as an example.

**Citizen Comments**

A project webpage was created on The City's website providing information about the proposed redevelopment. An online survey was also used for residents to provide feedback. Forty-three surveys were completed some of the comments and concerns are listed below:

Respondents identified a number of **merits** about the proposed development. The merits noted are summarized below along with the number of times the merits were noted. Achieves density for inner city community (3); economic benefits for local businesses (2); increased population could lead to increased transit service (1); preservation of the school building (7); neighbourhood revitalization (3); development could keep unwanted activity out of the neighbourhood (1); opportunity for new residents to live in Bridgeland (1).

Respondents identified a number of **improvements** the proposed development could make to make it more beneficial or compatible with the community. The improvements noted are summarized below along with the number of times the improvements were noted. Reduce density / reduce the number of units (10); keep school functioning as a school (10); maintain all of the green space and trees (8); single family dwellings only (6); apply urban design

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guidelines and architectural controls (4); reduce building heights (3); affordable housing units (3); convert the school into lofts (3); change location (1); rent control (1); incorporate underground parking (1); limit the development's entrance/exit to 2 Avenue (1).

Respondents identified a number of **impacts** the proposed development could have on neighbours and the community. The impacts noted are summarized below along with the number of times the impacts were noted. Increased traffic (24); loss of green space and trees/vegetation (24); parking issues (19); change character of the area for the worse (14); increased noise (10); loss of school / loss of educational options for residents' children (9); building height will reduce privacy for neighbours (6); reduced property values (4); increased congestion would cause safety risks for pedestrians and children (4); loss of views (4); loss of historic site (2).

Respondents identified a number of **other thoughts** about the proposed development. The thoughts noted are summarized below along with the number of times they were noted. More time needed for public consultation (7); this development has been poorly planned (5); construction will negatively impact neighbours (1); well thought-out plan (1).

Many citizen comments were also received regarding the proposal from the land use amendment and development permit circulations, the majority being in opposition. Comments in favour were supportive of the redevelopment of the site and proposed built form.

A summary of how citizen comments have been addressed is below.

Themes	Feedback	City Response
Density	The proposed density is too much for the site and is not limiting under the M-C1 district.  Densification north of the river will provide more opportunity for people who wish to work and live near the downtown.	The proposed site is close to the downtown core and primary transit, and is a good site for sensitive intensification as guided by the Municipal Development Plan. A density modifier and a density policy in the ARP amendment will limit the density to the 39 units being proposed.
Building height	The proposed height is too tall and will cause privacy issues and shadowing of the houses along 11A Street.	The proposed building is three storeys and similar to the height of the school building. A shadow study has been provided and minimal impacts occur to neighbouring properties early in the morning.
Architecture/Design	The modern architecture of the residential buildings doesn't fit within the area of the community.	The design of the buildings will provide for more surveillance of Tyndale Park and add to the existing variety of architecture within Bridgeland. The new buildings will also help highlight the historic school building.
Traffic and parking	The proposed access is dangerous and the minimum bylaw parking is insufficient.	A traffic impact assessment was not required for this application due to the low number of units. However the applicant provided a traffic assessment for the City to review. The



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		proposed driveway locations and width meet the requirements from the Fire Department and Transportation Department. The City's position is the bylaw minimum parking requirement is sufficient in this location for the residential portion due to the proximity of transit and other mobility options. Parking requirements for the historic building is still being determined.
Landscaping and public space	No existing vegetation should be removed on the site and the entire site should be fenced.	The proposed development will necessitate the removal of some of the trees on site. Overall the proposed development will provide an increase in vegetation on the site. The City is reviewing the fencing requirements to delineate the park from the private property.
Quality of life	The loss of the playground and school will be a negative to the community. There will be the loss of a park. Will be unable to see the hill or the downtown.	The proposed site is private and therefore the City can't protect it as a park. The City is unable to control whether the property remains in operation as a private school. New residential development is compatible next to existing residential development. A suitable playground location in Tyndale Park could be examined further. Access to a view is not a planning matter that can be considered.
Built form	The proposed grading and elevation of the main floor is too high.  Townhouse development provides more housing choice within the inner city for families.	The site has some grading challenges, if the buildings are significantly lowered additional retaining walls will be required. The southern half of the building along 11A Street has been lowered to help address these concerns.
Access to Tyndale Park	The proposed design will reduce access to Tyndale Park.	The proposed development will increase access to Tyndale Park by providing two public connections through the site to the park, in the form of a staircase and a pathway.
Historic Building	No changes should occur to the historic school building.	Regulated portions are negotiated with the owner to preserve historic character defining elements while balancing the needs of the current/future users
Application process	A concurrent application process doesn't allow the issues to be separated.	The City has received many comments on the Land Use Application and on the Development Permit Application clearly separating the two issues. The City has received positive feedback on concurrent applications to help people understand what is proposed to be built with a land use redesignation. The ARP amendment and Land Use application has to be approved by Council first prior to the development permit being approved.

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**Public Meetings**

Four public meetings were held for this redevelopment. Before an application was submitted, Minto had a booth up at the Bridgeland farmers market in the fall of 2014.

On 2014 November 25, community residents organized a meeting to gather information about the redevelopment in a question and answer forum with the City Planner. The meeting was well attended by approximately 100 people.

On 2014 December 17, a public open house was held by the developer at the Bridgeland Community Association. The applicant and consulting team along with the City Planner were in attendance.

On 2015 June 10, Minto held an open house on the development application.

On 2015 November 23, a public open house was held by The City at the Bridgeland School site. Approximately 90 people attended, of those 51 filled out feedback forms. The responses are summarized below.

Respondents identified a number of **concerns** about the Bridgeland School Site Redevelopment ARP amendments and land use amendments. The concerns noted on feedback forms are summarized below along with the number of times they were mentioned.

Concern	Number of mentions
Don't support any rezoning or ARP amendment	25
Too much density	9
Don't support the built form of townhouses	3
Require a recent traffic study, increase in traffic, not enough parking, traffic calming	14
Need to guarantee the historic portion is used for arts and public uses, future use of school should be open to public input, too much uncertainty with the school site, want a library and community arts centre	9
A new ARP should be created	4
School building needs a height limit in the ARP	1
The DP shouldn't inform the zoning	1

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Respondents also had **positive feedback** about the Bridgeland School Site Redevelopment.

Positive feedback	Number of mentions
Maintenance of the original school building	2

Respondents identified a number of **concerns** about the development permit for the Bridgeland School Site Redevelopment.

Concern	Number of mentions
Massing is too big/invasive for the area, building entrances along 2 Ave N.E. need to be lowered, height is too high	16
Public access to the park is insufficient, how is the access guaranteed	7
Doesn't promote affordable housing	2
Reduction in park space, too much shadowing on the park, development creates a fortress around the park, eliminate the south building to open up the park space, park looks like a private backyard; no active eyes on the park	8
Will create a gated community	1
Buildings are not aesthetically pleasing	2
No driveway access to 11A St. N.E.	1
Loss of privacy along 11A St. N.E., need more clarity on shadow study	2
Too many existing trees are being removed	1

Respondents also had **positive feedback** about the development permit for the Bridgeland School Site Redevelopment.

Positive feedback	Number of mentions
Height is improved	1
The developer has improved the development	3
Agree with fence separating the building site with the park	1

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Respondents identified a number of additional **concerns** about the Bridgeland School Site Redevelopment in general.

<b>Concern</b>	<b>Number of mentions</b>
Not an open forum to gather feedback, didn't capture the feedback of the community to date, poor communication on the project	7
City is not taking an objective perspective, more clarity needed on how comments have been incorporated into the proposal and what happens next, resident's concerns won't be represented by The City	3
Development should be focused elsewhere in Bridgeland	7
DP process should not be combined with land use process	2
The development will be a detriment to the neighbourhood, provides not benefit to the community	9
There is demand for inner city schools	1
Safety and noise concerns need to be addressed during construction	1
Area should remain a playground zone, guarantee a new playground is built, improve the green space	8
Traffic, parking and green space should be addressed for the community as a whole, require more green space in the community, percentage of green space for Bridgeland is below The City's requirements	6
Want to know child population growth	1
More clarity regarding how comments have been incorporated into the proposal and what happens next	1

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Respondents also had **positive feedback** about the Bridgeland School Site Redevelopment in general.

<b>Positive feedback</b>	<b>Number of mentions</b>
Like the preservation of the school for a community use	2
Reduction in building	1

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**APPENDIX I**

**APPLICANT'S SUBMISSION**

Minto Communities has retained O2 Planning + Design to undertake a land use redesignation to support the redevelopment of the site of the former Bridgeland School Site at 414 11A Street, NE. A Development Permit (DP) application for the proposed redevelopment project has been submitted concurrently to support the land use application. The development permit provides further detail regarding the development project that Minto is proposing to build and provides additional certainty to all stakeholders including the local community of the intent of the land use application.

Minto proposes a comprehensively designed development concept for the site that focuses on retaining and legally protecting the original historic portion of the Bridgeland School and building 39 back-to-back townhouses on the parcels adjacent to the historic school building. The Bridgeland School will be legally protected as a Municipal Historic Resource and Minto is currently in the process of working with a community based organization to acquire the school building. A Direct Control (DC) district based on the Special Purpose – Community Service (S-CS) land use district is proposed that will allow for a variety of community focused uses including arts incubator, event facility and social organization to operate within the school building.

The townhouse parcels are proposed to be redesignated Multi-Residential – Contextual Low Profile (M-C1). The M-C1 land use district will accommodate the development of context-sensitive, family-orientated housing. The height and scale of the townhouses fit within the immediate context of the neighbourhood and complement the scale of the historic Bridgeland School. Each townhouse will have a front door accessible either from the public sidewalk for homes facing public streets or private sidewalks for homes facing Tyndale Park or the interior of the site. The introduction of townhouses facing 11A Street and 2<sup>nd</sup> Avenue will activate these streets by increasing pedestrian movement as the front door will be the only access point for residents and their visitors. Parking for the townhouse residents will be accommodated in common garages below each townhouse building.

Tyndale Park will benefit from the additional surveillance created by the townhouse units facing the park. Public access through the site to Tyndale park will be maintained and improved by the introduction of a “woonerf” style shared street as well as a staircase and pathway leading to the park. The woonerf will be a pedestrian focused environment that will be shared by the residents of the townhouses, patrons of the community building and residents of the wider community. The proposed development will contribute to the ongoing redevelopment of Bridgeland as a vibrant inner city neighbourhood.

Minto engaged with the community during the entire application process. Community engagement commenced prior to the submission of the formal land use application with an introductory meeting with the community association and presence at the Bridgeland farmer's

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market. Consultation continued throughout the application with two developer led open houses that presented and requested community feedback on the land use and development permit applications. Based on the community feedback provided during the consultation process, Minto made several changes to the proposed development concept. The changes included eliminating the proposed conversion of the historic school building into residential apartments, reducing the overall height of the townhouse buildings, stepping the northern townhouse building to bring the front doors closer to grade and improving the pedestrian connection to Tyndale Park by introducing the woonerf and staircase leading directly to the park.



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**APPENDIX II**

**PROPOSED AMENDMENTS TO THE BRIDGELAND-RIVERSIDE  
AREA REDEVELOPMENT PLAN**

1. Delete the existing Figure 3 entitled "Generalized Land Use" and replace it with the revised Figure 3 entitled "Generalized Land Use" (APPENDIX III).
2. In Part 2 Bridgeland-Riverside Area Redevelopment Plan, Section 3 Residential, Implementation, after the last paragraph add a new section 21 as follows:

"21. Historic Bridgeland School Site

This site is the former home of the Bridgeland School originally constructed in 1921. The intent of this policy is to provide for reuse of the historic Bridgeland School building for a range of community uses as well as multi-residential development to the north and east of the school building.

a) Community Use

The historic portion of the school shall be maintained for community uses such as an arts incubator, artist studios, child care facility, school, and performing arts centre.

Demolition of non-historic portions of the building, rehabilitation of the original school building and new additions shall be conducted to the satisfaction of the Heritage Approving Authority and align with best practices in heritage conservation, as per the Standards and Guidelines for the Conservation of Historic Places in Canada.

b) Multi-Residential Development

The north and east portions of the site will be redeveloped with multi-residential development with a maximum height of 14 metres across the entire building, excluding ancillary structures as defined by the Land Use Bylaw and a maximum of 39 dwelling units. All dwelling units along the ground floor fronting a street should have direct at grade access to the street.

c) Circulation and Access/Open Space

Access into the development shall be taken from 11A Street NE and exit from the development shall be onto 2 Avenue NE. Public access should be maintained through the site to the park to allow for a direct pedestrian connection."

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APPENDIX III

REVISED "FIGURE 3 - GENERALIZED LAND USE"

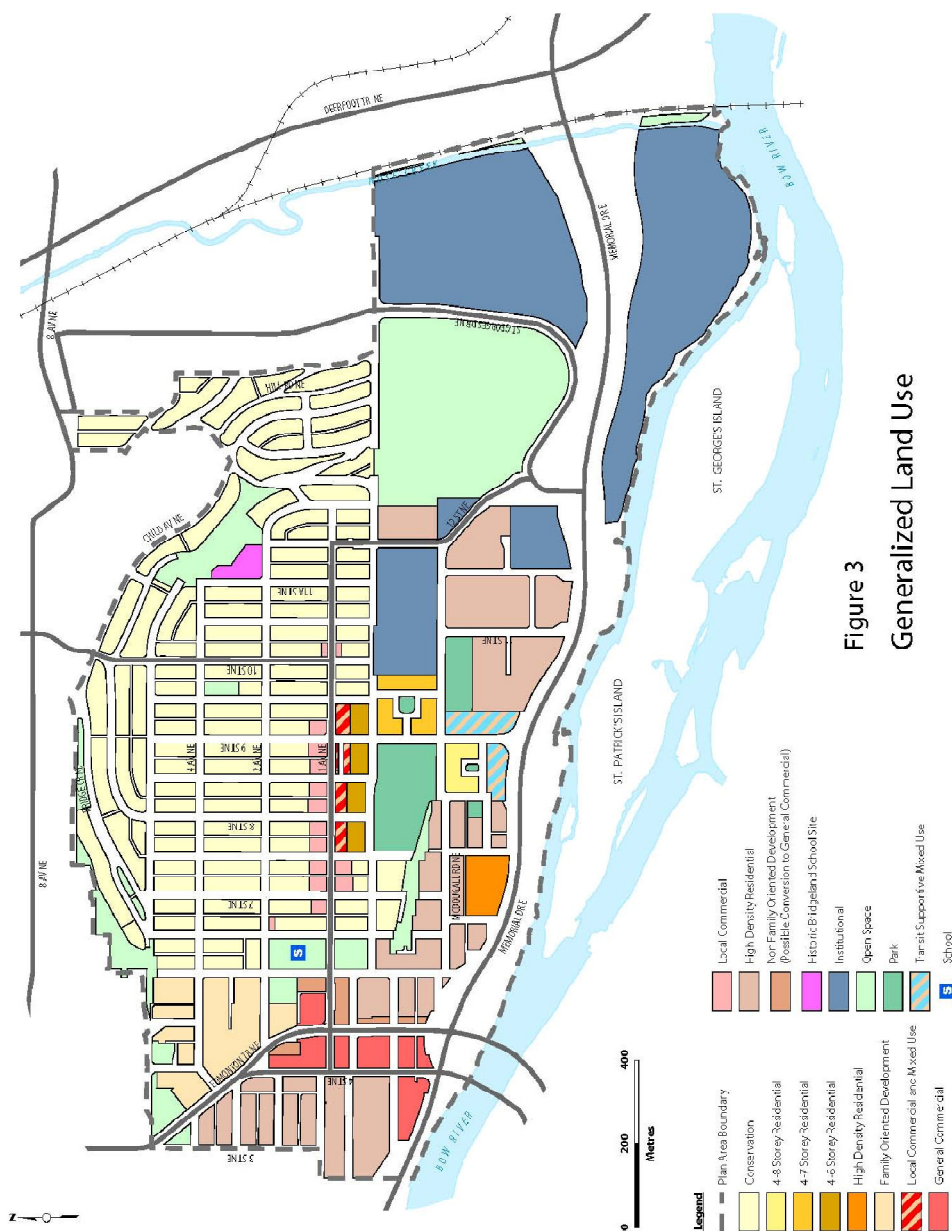


Figure 3  
Generalized Land Use

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APPENDIX IV

PROPOSED DIRECT CONTROL GUIDELINES

**Purpose**

- 1 This Direct Control District is intended to allow for the preservation and adaptive re-use of the ***Heritage Building*** by allowing for additions to the ***Heritage Building*** and a mix of ***uses*** within the ***Heritage Building***.

**Compliance with Bylaw 1P2007**

- 2 Unless otherwise specified, the rules and provisions of Parts 1, 2, 3 and 4 of Bylaw 1P2007 apply to this Direct Control District.

**Reference to Bylaw 1P2007**

- 3 Within this Direct Control District, a reference to a section of Bylaw 1P2007 is deemed to be a reference to the section as amended from time to time.

**General Definitions**

- 4 In this Direct Control District,
  - (a) ***“Heritage Building”*** means the historic ***building*** known as the Bridgeland School located at 414 - 11A Street NE which is a City Wide Historic Resource on The Calgary Heritage Authority’s Inventory of Evaluated Historic Resources.

**Defined Uses**

- 5 In this Direct Control District,
  - (a) ***“Arts Incubator”*** means a ***use***:
    - (i) where art may be produced by individuals;
    - (ii) where artistic practices and community programming are developed, instructed, researched, exhibited, presented or administered;
    - (iii) where art or cultural resources, including but not limited to, artefacts, literature, publications and other materials related to art may be made, displayed, stored or maintained;
    - (iv) that may include ancillary retail activities;
    - (v) where groups may assemble to participate in recreation, social or cultural activities;

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- (vi) that may include ancillary areas for the preparation and consumption of food and beverages within the ***Heritage Building*** or outside of the ***Heritage Building***; and
  - (vii) where a specific license for the sale of liquor may be issued by the Alberta Gaming and Liquor Commission, that allows minors on the premises at any time.
- (b) “**Event Facility**” means a ***use***:
- (i) that provides facilities for meetings, seminars or other special events; and
  - (ii) where live performance of theatre, music, dance or other artistic activities are available to the public.

**Permitted Uses**

- 6** The ***permitted uses*** of the Special Purpose – Community Service (S-CS) District of Bylaw 1P2007 are the ***permitted uses*** in this Direct Control District.

**Discretionary Uses**

- 7** The ***discretionary uses*** of the Special Purpose – Community Service (S-CS) District of Bylaw 1P2007 are the ***discretionary uses*** in this Direct Control District with the addition of:

- (a) **Accessory Food Service;**
- (b) **Accessory Liquor Service;**
- (c) **Arts Incubator;**
- (d) **Artists Studio;**
- (e) **Event Facility;**
- (f) **Instructional Facility;**
- (g) **Office;**
- (h) **Performing Arts Centre;**
- (i) **Place of Worship – Small;**
- (j) **Retail and Consumer Service;**
- (k) **Restaurant: Licensed – Small; and**
- (l) **Social Organization.**

**Bylaw 1P2007 District Rules**

- 8** Unless otherwise specified, the rules of the Special Purpose – Community Service (S-CS) District of Bylaw 1P2007 apply in this Direct Control District.

**Building Height**

- 9** The maximum ***building height*** is 16.0 metres.

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Use Rules

- 10 (1) All **uses** must be located within a **Heritage Building**.
- (2) **Retail and Consumer Service** must only operate in conjunction with another approved **use**.

Front, Rear and Side Setback Area

- 11 (1) The **setback area** from the front and west **side property lines** must have a minimum depth of 3.0 metres.
- (2) There is no requirement for a **rear setback area**.
- (3) There is no requirement for an east **side setback area**.

Required Motor Vehicle Parking Stalls

- 12 A minimum of 7.0 **motor vehicle parking stalls** is required for the **Heritage Building**.

Required Bicycle Parking Stalls

- 13 A minimum of 6.0 **bicycle parking stalls – class 2** is required for the **Heritage Building**.

Required Loading Stalls

- 14 There is no minimum requirement for **loading stalls**.

Landscaping in Setback Areas

- 15 (1) All **setback areas** on a **parcel**, not including those portions specifically required for motor vehicle access, sidewalks, or any other purpose allowed by the **Development Authority**, must be a **soft surfaced landscaped area** or **hard surfaced landscaped area**.
- (2) All **setback areas** must provide a minimum of 1.0 tree and 2.0 shrubs for every 70.0 square metres.

Additional Landscaping Requirements

- 16 (1) All areas of a **parcel** must be a **soft surfaced landscaped area** or **hard surfaced landscaped area**, unless specifically allowed by the **Development Authority**.
- (2) All **soft surfaced landscaped areas** on a **parcel** with **buildings** used or previously used for **School Authority – School** do not require an underground irrigation system.

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- (3) Every **building** on a **parcel** must have at least one pedestrian connection from the **public entrance** to a public sidewalk, or in the case where there is no public sidewalk, to the nearest **street**.
- (4) Where a **building** contains more than one **use**, every **use** that has an exterior **public entrance** must have a pedestrian connection from the **public entrance** to the pedestrian connection referenced in subsection (3).
- (5) Every **building** on a **parcel** must have at least one pedestrian connection from the parking area to the **public entrances** of the **building**.
- (6) The maximum **hard surfaced landscaped area** is 115 square metres.

**Relaxations**

- 17 The **Development Authority** may relax any of the rules contained in this Direct Control District provided the test for relaxation in accordance with Sections 31 and Section 36 of Bylaw 1P2007 is met.

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**APPENDIX V**

**LAND USE LETTER SUBMITTED**



Planning Committee  
Bridgeland Riverside Community Association  
917 Centre Avenue NE  
Calgary AB T2E0C6  
brccalgary.org

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

31 December 2015

ATTN: CPAG.Circ@calgary.ca  
RE: LOC2014-0161 (414 – 11A Street NE)  
Cc: Shawn Small (shawn.small@calgary.ca)  
Ali McMillan, Planning Director ([BRCAplanning@gmail.com](mailto:BRCAplanning@gmail.com))  
Joe Belland, Development Sub Lead ([sold@stonepointrealty.com](mailto:sold@stonepointrealty.com))

To Whom It May Concern:

We are responding to your request for community feedback in response to LOC2014-0161 that is running concurrently with DP2015-2867. We understand that there is no specific format for feedback in respect of such land use (re-zoning) applications. This letter also comments upon the Proposed Direct Control Guidelines and the Proposed ARP amendment as drafted by the applicant, both of which are inherently linked to the LOC2014-0161 application.

The proposed re-zoning of this particular site is a very contentious issue for a significant number of Bridgeland residents. Some reactions focus upon the proposed density (i.e. intensity of use) for the site but most reactions are from residents who do not wish to see this site rezoned at all.

The information and feedback gathered by by Bridgeland Riverside Community Association (BRCA) in formulating its comments has been derived from several sources, including but not limited to the following:

- The City's recent Open House held on Monday 23 November 2015. Residents and/or others in attendance at that event were asked by BRCA to identify their properties on a printed map showing all structures in the neighborhood, and to apply color to their addresses. The color green was used to indicate "support for the proposed MC-1/ DC land use changes"; yellow was used to indicate "more information/clarification required"; and red was used to indicate "not supportive of any land use change". Of the forty-five (45) residents who identified their properties on the map, forty-three (43) of them expressed opposition to the land use change (and with most of these people living in reasonably close proximity to the site in question). There were no properties colored in green (in other words,

S. Small



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nobody in attendance at the Open House self-identified to BRCA as being supportive of rezoning) and there were only two (2) yellow indicators requesting more information. The BRCA has not yet provided the results of this informal poll to the neighborhood nor canvassed in a similarly structured way those "affected persons";

- **Resident engagement by BRCA (as part of the DP feedback process).** The DP application was released to BRCA in the summertime for comment, and, in tight turnaround, notices concerning the DP application were circulated to all adjacent properties and meetings were held to compile BRCA feedback. (Neighborhood / citizen participation at this time was somewhat impaired given both the short notice provided to BRCA for DP commentary (after such a long prelude) and also summer-vacation timing. The resulting community based meetings residents voiced their opinion on the proposed development and (in most cases) their objection to rezoning, albeit in the context of providing feedback more generally in relation to the DP (which feedback assumed rezoning by its nature).; The BRCA has yet to conduct a wider engagement on the land use issue due to the changes by the applicant that were still ongoing into late November.
- **Resident engagement by the applicant.** The Applicant convened one substantial Open House regarding the site past the date when the neighborhood became aware of the project and during the tenure of the current Planning Committee and BRCA Board. BRCA representatives attended. The significance of resident feedback at the event is difficult to measure, for at least two reasons. One is that the Applicant introduced significant new concepts at the Open House for the first time and without notice (in particular, a proposed call for expressions of interest in relation to the School building, which to BRCA's knowledge never then occurred as represented); and, secondly, the fact that the Open House was organized to suit the Applicant's needs. The first point means that there was much confusion and discussion among attendees concerning the significance of the potential future for the School building itself; the second point means that the event did not allow anybody other than the Applicant to gather structured feedback. The Applicant did collect feedback and contact information from many attendees, but despite requests has never disclosed to BRCA details concerning the feedback received.
- **A private lawn sign campaign** running in the neighborhood for approximately a year, objecting to the rezoning of the site. 165 signs have been placed in the yards of residents. The majority of signs are within a few block radius of the site, though there are signs elsewhere in the community as well.

What follows below is feedback from the BRCA Planning Committee as drawn from the foregoing sources and also as reflecting the views of Committee members. Due to the timing of the City's Open House and then the holiday season, BRCA has not been able to undertake a fresh round of broader (plebiscite-style) community engagement (asking LOC-specific questions) in time for the CPC deadline of 05 January 2016. We do intend to share our current feedback and findings with the greater community in the New Year and if additional comments are heard, they will be shared with you in advance of the March sitting of City Council (at which time we understand the concurrent applications are scheduled to be brought before Council for a decision on LOC2014-0161).

FEEDBACK REGARDING LOC2014-0161

- 1) Maintain the current zoning to preserve a future for the site involving continued school use or some other compatible amenity use.

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- There is concern that Bridgeland has very few S-CI sites, and many residents wish for the site zoning to be unchanged in order to facilitate a future school or other community amenity on the site.
  - The concurrent DP and LOC applications in this case result from a “behind closed doors” conditional sale transaction that presupposes a successful developer-led rezoning initiative as a condition to outright sale. The fact that such transaction exists in this case as a starting point significantly stunts discussion. The reality is that the open market has never been tested to gauge the marketability and feasibility of the site as an SC-I property. Many on the BRCA and outside of it have strong views and also some information to suggest that—for example—there is indeed a private-school market for the site. Discussions on this file concerning the interest or lack thereof in the site from the Public and Separate School boards are probably off base and off topic. Asking those who oppose re-zoning to prove a hypothetical case—i.e. that there would be a good SC-I buyer if the property had ever been marketed—is effectively unfair since it makes the current owner’s private deal self-justifying; the presence of that deal itself prevents the requested proof from materializing.
  - Many residents are concerned about the loss—in practical terms—of open space associated with S-CI (school) zoning. Such open space (and the associated playground on private lands but subject to public use) will most certainly be eliminated with new development resulting from the proposed rezoning. The “amenity” character of SC-I lands, especially when used for schools, may also have subjective elements. Schools are natural gathering places; the presence of small children enlivens a neighborhood. The “heart and soul” function of SC-I zoning is at stake for many residents.
- 2) Reservations regarding the “spot-rezoning” of lands in the absence of a local plan to structure rezoning activities and while requiring an amendment to the existing Area Redevelopment Plan that would otherwise suggest rezoning should not occur.
- The most unifying concern expressed by adjacent neighbors, residents in general, and the BRCA is that this rezoning application is being made without any support from a local plan and that, in fact, it is directly contrary to the existing and applicable local plan (the current ARP). We therefore use the term “spot-rezoning” here to mean, “the rezoning of isolated parcels without a local plan indicating support of such rezoning.” We wish to register our concern that such spot-rezoning fails to give affected persons any reasonable basis for anticipating proposed changes in land use, which leads to the frustration of neighbors—some of whom have written letters against this proposed rezoning. Some of these individuals may in fact support evolutionary and incremental change in neighborhood’s land uses (rezoning), yet feel that such activities should fit within a broader, and publicly acknowledged, vision. Spot re-zoning could therefore be seen as being effectively contrary to “planning” according to the ordinary use of the word. The making of rezoning decisions without a supportive local plan effectively means that such decisions are not planned at all; they simply happen reactively or on an ad hoc basis in response to particular applications received or promoted. This is exacerbated where the rezoning ramifications are substantial (in terms of land use, and density) with significant and permanent effects.
  - If the site—currently designated in the ARP as part of the “conservation area”—is to be rezoned and redeveloped beyond what the current ARP or surrounding zoning would allow (R-C2), the general consensus is that a plan should first be in place to ensure (insofar as is possible) that spot-rezoning is not then taken up as the community standard—if it is permitted at all. The logical consequence of this point is that since no such plan exists today, the same consensus rejects the proposed application in principle.



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- As a Planning Committee, we are aware of the City mandated goals of the Municipal Development Plan and the general thoughts that exist with regard to increased density for our neighborhood; similar awareness of the MDP likely does not exist in the broader community. It is generally anticipated in the MDP context that areas south of 1<sup>st</sup> Avenue are more probably implicated as being the primary locations for MDP related density goals. In a similar vein, we understand that residents in the greater community were led to understand (during the course of the Bridges redevelopment) that increased density was to be localized to the lands directly associated with the Bridges and that the existing “conservation zone” as stated in the ARP was not to be implicated by any broader City initiative for increased density. Given these comments, the following specific excerpts from our ARP therefore—we suggest—comprehensively address the situation notwithstanding any general language in the MDP (or outside of it):

*“The Calgary Municipal Plan states that residential densities in the inner city should be increased. The primary reasons are that such changes would better utilize the existing infrastructure and that the strategic locations of such neighborhoods should be recognized. However the “appropriate locations” portion of the goal is equally important as other locations could effectively destroy the desirable aspects of inner city living.”*  
(page 8)

Concerns with respect to this point revolve around the irrevocable loss of a community S-CI site. As an S-CI site with its current physical configuration, the site offers considerable open space and perceived “public use” of open playground areas, and maintaining SC-I zoning would preserve the possibility of new parks, schools, and/or other adaptive community amenities. The site has a strategic community “heart and soul” location. If that site is rezoned to permit residential development (of any sort) the future possibility of schools, parks, or other amenities is lost forever. Given the quoted wording contained in the ARP above, the selecting of density locations that are not first planned and identified as being “appropriate” could (over time tend to) “effectively destroy the desirable aspects of” living in both Bridgeland and in this inner city region more generally.

*“6. TO DEVELOP A MORE COMPREHENSIVE STRATEGY DEALING WITH AMENITIES SUCH AS RECREATION AND OPEN SPACE. In order that all actions of such a nature contribute towards an ultimate stage, such a strategy is necessary. This will ensure city purchased land, recreational improvements and landscaping are not done in an ad hoc manner. It is important to have such actions compliment each other. For example, it might be desirable to acquire land for open space so that a continuous pattern of land would lead to the recreational facilities.”*  
(page 9)

While the site in question is private land and not part of the larger network of city owned lands available for recreation and open space, it is important to note its use as an amenity by the community for almost 100 years. As a school site, the majority of the land has been used both as an open space, and as a “shared use” playground for local children. This would suggest that perhaps the zoning should remain “as is” until such a time wherein the City could incorporate it into its network or permit a private owner/developer to maintain the parcel as part of the informal open space system that the community has heretofore enjoyed.

It also bears emphasis that when the site was sold to its current owner, City Council at the time expressly took into account the (about-to-become-private) school lands while calculating the neighborhood’s percentage allotment of park space. Thus City Council

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attended to the reality that the site was expected to continue playing a role in fulfilling park-space needs.

*"8. TO CONSERVE AND STABILIZE THE FAMILY ORIENTED AREAS OF THE COMMUNITY AND TO ENSURE THEIR LONG TERM VIABILITY. A primary focus of the Neighborhood Improvement Program is to ensure that older residential neighborhoods are improved and stabilized. The Inner City Plan, while calling for increased densities in such areas, also recognizes the need for stabilizing portions of neighborhoods by conservation so that opportunities for family living remain."*  
(page 9)

*"The Bridgeland (sic) area is currently designated low-density residential (R-2) but contains three small parcels of land which are classified medium density residential RM-4 (M-C1 being the current zoning equivalent). These parcels have not been developed beyond the limitations of R-2 guidelines. RM-4/M-C1 development is not desired by the residents in this area and is not compatible with the establishment of the conservation district."*  
(page 35)

*"The community supports the establishment of the R-C2 conservation district,..."*  
(page 36)

We understand that the current development plans for the site (should rezoning occur) indicate a medium density townhouse development. While we do not disagree that townhouse developments are, in general, conducive to family living, at the same time we feel that the entirely contiguous or unbroken character of the built form (i.e., long solid buildings) proposed via the requested M-C1 zoning and associated DP is not conducive to preserving the neighborhood character of adjacent R-C2 parcels. Thus, even on the for-sake-of-argument assumption that some rezoning of the parcel is inevitable, we would in such a case be much more convinced by an M-CG zoning that would permit several smaller buildings of more modest height. Smaller, 4-plex type buildings, would be more consistent with the single-family R-C2 parcels adjacent and other existing built forms within the "conservation area".

*"...areas suitable for higher density development be identified and that such developments minimize impacts on the remainder of the community."*  
(page 10)

Areas for higher density development have already been identified in both the Area Redevelopment Plan for the Bridges Development and to some extent (provided such are not inconsistent with an applicable local plan) via the Municipal Development Plan as well. All implicated areas are south of 1<sup>st</sup> Avenue and/or west of 6<sup>th</sup> Street NE, and all of this is documented in the Bridgeland ARP:

*"The encroachment of widened Memorial Drive and new overhead ramp onto Edmonton Trail South will tend to discourage single-family house owners from maintaining their houses. Thus, medium density, multi-family housing would be more compatible in this area."*  
(page 38)

Viable areas in which to concentrate desired increases in density are already available in the community. There is no need, nor is there any statutory planning rationale, to use the general desire for increased density as justification for rezoning in the heart of the



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“conservation area” and directly contrary to the existing ARP, particularly when many appropriately designated areas are still available.

*“Community’s existing schools and their grounds are to be conserved to assure proper residential services. Their usefulness to the community should be re-enforced with expansion of services to include adult education, special education and community recreation and social programs. It is expected that in future, the land use policy as outlined for the community will encourage an increased student component which will in turn ease pressure to close existing schools.”*  
(page 36)

While we understand that the existing Bridgeland School site could likely not meet the requirements for a typical “neighborhood” public or separate school, it could meet (and has been meeting for approximately 20 years) the needs of a smaller or specialized school or similar facility offering recreational and/or social programming. While the currently proposed Direct Control guidelines connected with this LOC application indicate that some sort of “public” program might be achieved (but only for the historic building on the site), there is no guarantee that the uses contemplated by the DC terms would ever materialize or thereafter be sustained. The financial character of the development proposed for the site will ultimately create financing constraints—certainly private but perhaps public as well—that could occlude such idealized futures. Additionally the typical open “yard” space that surrounds a school-type institution would inevitably be lost in consequence of the rezoning currently proposed, and such loss would vastly reduce the remaining usefulness for many specialized school or recreational and social programming applications. The site’s proximity to downtown makes it desirable as a workplace school or daycare. Loss of inner city school sites is a concern as our community gentrifies, and the relocation of such sites to the City’s periphery effectively just reverses in direction the problem of automobile over-reliance; why bring people to the center and then push their school amenities to the edges? We want to promote Bridgeland Riverside as a “walkable community” and see the provision of a variety of school choices (private, public, and specialized) within that as a benefit to our families.

*“Much of the open-space and building facilities now available to the community in School Board land could be lost by way of the closure and sale of any of these lands.”*

Unfortunately many of the arguments that could have been made with respect to the ARP and as they relate to this parcel have been weakened or complicated due to the fact that this formerly CBE- and then City-owned parcel was sold to the private sector years ago. Even here, however, it bears emphasis that when the current owner acquired the site, zoning status of the site was changed from a generic R-2—which always accommodated public schools as permitted uses—to a Direct Control based upon R-2 but solely to allow for a private school. The subsequent “rolling up” of the site into an SC-I classification at the time of the 2007 land use amendment obfuscates this history. The history is one where City Council in the past has preserved only a school use. In any event, the historical intent for the community is summed up and supported by...

*“The present status of joint use sites should be made secure by way of redesignation of these lands to school and community reserve. The use of schools in the community is on the increase. The schools in the community are viable. They are an important element in attracting young families to the community and in stabilizing the residential nature of the community.”*  
(page 42)

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The current S-CI zoning of the site, even under private ownership, can support many community oriented, joint-use, and community reserve elements as it has done since its original construction in 1901. The application for rezoning is not due to the lack of usefulness under current zoning but rather for a more profitable land sale. This is cause for significant concern wherein profit could usurp planning.

3) Concurrent LOC and DP applications.

- As the LOC application is running concurrently with the DP application for the site, much of the commentary as it relates to the rezoning is tied inevitably as well to comments concerning the proposed built form. Comments as they relate to the DP are extensive and have been previously submitted to the City. Further comments on the re-design are also forthcoming.

DIRECT CONTROL GUIDELINE COMMENTS

The initial review of the proposed DC Guidelines (attached) results in these comments to date:

- Assuming rezoning for the sake of argument, support from adjacent neighbors for a list of discretionary uses that includes restaurants (licensed) and retail components is unlikely.
- The height maximum of 16 m is not supported by the BRCA. We see this height maximum as having been proposed, by the applicant, as a way of permitting the excessive build up of site grades to accommodate the intended building design. We do not support the proposed site build up as the only way to develop the site and would not—assuming rezoning—support any height maximums in excess of 12.5m. Such a maximum can be achieved via a slope adaptive design.
- The proposed Guidelines contemplate as a permitted use the idea of an “Arts Incubator” use. To our knowledge, this capitalized term is proposed to be defined via this Direct Control language for the first time in the City, having previously simply been conjoined with C-Space discussions. We are aware, of course, of C-Space having been identified as a proposed user of the historic school building. In context, we are concerned about the probability that this defined term has effectively been tailor made today and for the first time in support of a potential rather than realized occupation by a particular user. The Guidelines should provide land use guidance, and not guidance tailored to suit particular civic agencies or initiatives, especially when there are financial and taxpayer issues at stake affecting the site and any such occupation. Among other things, the fairly generic list of activities tied to the term “Arts Incubator” in the Guidelines seems merely descriptive of C-Space: a place where art is made and exhibited, with some retail, and the licensed sale of alcohol, etc. All of that, so far as it goes, simply describes a building in which such activities might occur. Many land-use designations would allow art to be made, art to be exhibited, and retail functions to occur. What, in this regard, does the word “incubator” signify at all? Presumably incubation means—as it always should mean as a plain language matter—some sort of support being given to something that otherwise could not survive on its own. Does this term embed some concept of public monies being used directly or indirectly for the benefit of C-Space on the site? Who will own the School building site if it is subdivided from the balance? How will such ownership be financed in taxation and other terms? What resulting occupancy (leasing) rates might be implied by all of this? The lack of clarity surrounding plans for the historic building, especially when overlaid with ideas of

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"incubation", is very troubling, since the initiative regarding the historic resource has to a very considerable extent been brought forward as a "selling feature" in favor of the rezoning.

PROPOSED ARP AMENDMENT COMMENTS

Our initial review of the proposed ARP Amendment language (as attached) specific to the portion of the land to remain as the school site, in itself, has not identified any technical or drafting issues. However, as commented above, continual amendment of the existing ARP simply to suit individual proposals and/or applications and without any planning oversight to facilitate a full rewrite and update of the document is inherently problematic and can obviously degrade any overall coherence to any planning rationale. It is unquestionable that the proposed ARP Amendment will suit the applicant's proposal, since the ARP Amendment has followed in this case from that application rather than vice versa. One way of making the point is to say: the only good ARP Amendment is one that would have been promoted and made by the City of its own initiative even without the trigger of a private land deal. Can the City say that its own planning initiatives and commitment to City (neighborhood) engagement would have targeted the site for rezoning if it were not for the actions of the private owner and developer in this case?

Thank you for the opportunity to review and comment on the above mentioned Land Use Application.

Sincerely,



Kirsten Dow-Pearce  
Planning Committee Representative  
Bridgeland Riverside Community Association

Per: Ali McMillan, Planning Director, Bridgeland Riverside Community Association  
Joe Belland, Chair, Development Permit Sub Committee, Planning Committee, BRCA



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**DEVELOPMENT PERMIT LETTER SUBMITTED**



Planning Committee  
Bridgeland Riverside Community Association  
917 Centre Avenue NE  
Calgary AB T2E0C6  
brccalgary.org

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

26 December 2015

ATTN: DP.Circ@calgary.ca  
RE: DP2015-2867 (414 -11A Street NE)—resubmission review  
Cc: Ali McMillan, Planning Director, BRCAplanning@gmail.com  
Joe Belland, Development Chair, joe@stonepointrealty.com  
Shawn Small, shawn.small@calgary.ca

To Whom It May Concern:

Thank you for the opportunity to comment once again with respect to the development permit application on the above noted project and after the applicant has re-submitted with revisions and clarifications.

Here is a summary of our comments based on the revised DP drawings and applicant responses to the City issued DTR regarding DP2015-2867:

1. We appreciate the applicant's attempts to address our concerns, with respect to overall development height, by removing the roof top access turrets and decks. These roof top access turrets, despite being over height, did, however, serve in giving the roofline of the development some articulation and interest. Now the roofline resembles a flat, tenement block that does not make the development harmonize with its detached, single-family house neighbors and makes it look more out of place as a mid-density apartment type block. The stepping of the roofline, splitting one solid roofline into two, seems arbitrary from a visual standpoint—although we recognize this was done again as an attempt to reduce overall heights. The difference between the two rooflines does not seem significant enough to be purposeful (from a design standpoint). Despite the attempts at addressing height concerns, the overall height of the development remains an issue with our committee.
2. Overall height concerns persist due to the excessive build up of the grade in order to facilitate a more cost-effective build. While we understand that this might be a prime factor for the construction of the development by the applicant, it is not a prime factor for our community or committee. **A townhouse development could be designed on this site without building up the grades to the degree proposed by this development.** Designing front doors closer to curb height would reduce the height of the development while also making it more compatible with the frontages of the single-family homes opposite. Curb-height relative grades would also create a more pedestrian and user-friendly development versus the excessive build up of overall grade requiring unusable 45° slopes, retaining walls and long runs of steps. Curb relative grades and the provision of underground parking could permit the return of the roof top decks as both resident

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- amenity and design articulation (notwithstanding overlooking concerns that accompany such amenities).
3. The shadow study provided to demonstrate the impact of the proposed buildings on the adjacent dwellings (PTD #6) is not yet complete. Shadows are not yet shown for the morning hours in September—arguably the time when shadowing would be most pervasive on residents across 11A Street. Due to the currently proposed heights of the development, persistent shadowing of Tyndale Park during the spring afternoon/early evening hours would occur. Lowering the development inline with the existing curb height would address this concern.
  4. The proposed “new” use for the old school building has not been guaranteed and therefore any assurances for parking, waste, recycling, and pedestrian connections cannot be guaranteed as these can fluctuate depending on the ultimate use obtained for the building. This is of significant concern as the use of the building as a purposed community resource (as stated by the applicant) to ensure full and permanent building usefulness is also yet to be consolidated..
  5. We would like any shared street/driveways/pedestrian accesses through the site to be guaranteed via a titled caveat. Despite the applicant’s assurances that such accesses will remain open to the public, there is nothing to guarantee this once condominium corporation/building management assumes control. The driveways could be gated or locked-off to the public and contrary to the applicant’s current intention.
  6. PTD#10—a walkway connection to the primary entrance of the school building should be provided. The applicant has indicated the east entrance to the historic building as the primary entrance. While it may be an entrance, it is effectively a fire exit and not the primary visual entrance to the building. That is located on the street fronting west façade.
  7. We continue to have issue with the “interface” between the existing school building, the proposed drive aisles, and the new development beyond. We feel that there is insufficient buffering between the historic building and the remainder of the site. The current proposed setbacks do not allow the historic building to have any “breathing room”. Rather than have the proposed property lines pulled tight to the historic school building, we would like to see a 1.2m (minimum) setback on the north side and a 2.4 or 3.0m setback on the east side. This would provide ample opportunity for landscaping as well as possible parking requirements for whatever future use goes into the historic site. These increased setbacks would not only provide visual “breathing room”, functional space (parking) and landscaping but it would also facilitate the protection of the school building as a historic resource if it is being sought. It would also facilitate grade contour designing as any discrepancies between the new grades on the residential portion of the site and the existing ones surrounding the historic building can be transitioned in the larger setbacks.
  8. Despite assurances that bylawed parking requirements have been met, there remains concern that the quantity of parking is practically insufficient for the three bedroom unit family-oriented housing proposed, visitor parking and parking required for whatever tenant occupies the historic school building without having serious implications for both street parking and vehicle access.

While we acknowledge the applicant’s consideration of some of our initial concerns, many of our initial comments, issued in our letter dated 20 August 2015, continue to be applicable:

- Many more modifications to the design COULD be made to improve buffering spaces between the required setbacks and the park yet they would likely lead to decreased unit counts, increased unit sizes and price points. The corollary being an entirely new proposed development and not really a modification to this existing one.
- Drastic changes COULD be made resulting in the removal of the proposed elevated grade levels, thereby permitting the entire development to be lowered to more appropriate heights sensitive to neighboring houses. This might mean that parking could be completely underground (i.e. excavated lower) and expanded to contain requisite visitor parking or parking for the subsequent development of the Bridgeland School building. Alternately the parkade entrance could be moved to the north end of the site on 11A Street to follow the natural downward slope of the site and help

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create slope-adaptive design. There are numerous design options that could make this development more compatible to the neighborhood, including stepping front and back units, completely lowering the building while providing parking access under the "elbow" park area between the buildings or other hybrid ideas. While this would ameliorate certain challenges posed by the site with respect to heights, we also fully understand that this would likely mean an entirely new development proposal. The proposed number of steps to the front doors of these proposed units (without amenity space at pedestrian level) does not complement the existing streetscape, does not meet with the considerations of "human scale" development, nor does it create a functional outdoor living environment at the street level of the dwellings – all of which are part of the inner city design strategy.

- We strongly feel a different design with underground parking and smaller, clustered buildings would be a better fit within the surrounding context/ intent of the "conservation zone". Although the design proposed falls within M-C1 guidelines, given the context of newly constructed single-family homes, and the currently enjoyed escarpment/park areas behind the site, development on this site should act more like a "bridge" and less like a "wall". The currently proposed development does not assist in creating, with the park and the adjacent homes, an interwoven community fabric. All design options presented by the applicant illustrate an omnipresent development with no context to the surrounding area.
- We understand the developer's desire to create a level site for the their construction budget. While cost-effective, their design solution exacerbates the grade and height challenges, increasing the impact on the neighboring residents, leading to the many issues highlighted above. General community feedback registers this site as special due to the historic school and Tyndale Park. We understand that existing grading may be a challenge but feel that there are more appropriately slope-adaptive designed responses (if it is ultimately deemed that this site is to be rezoned). More appropriate designs could include fewer units, greater buffering of the park and historic building interface, and the continuing provision of community amenity both in the historic building and the currently enjoyed open space.

Sincerely,



Kirsten Dow-Pearce  
Bridgeland Riverside Community Association

Per: Ali McMillan, Planning Director, Bridgeland Riverside Community Association  
Joe Belland, Chair Development Sub-Committee, Bridgeland Riverside Community Association



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Planning Committee  
Bridgeland Riverside Community Association  
917 Centre Avenue NE  
Calgary AB T2E0C6  
brcacalgary.org

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

20 August 2015

ATTN: DP.Circ@calgary.ca  
RE: DP2015-2867 (414 –11A Street NE)  
Cc: Ali McMillan, Planning Director, BRCPlanning@gmail.com  
Joe Belland, Development Chair, joe@stonepointrealty.com  
Shawn Small, shawn.small@calgary.ca

To Whom It May Concern:

Thank you for the opportunity to comment with respect to the development permit application on the above noted project.

Here is a summation of our responses to the City posed questions with respect to developments in our community and in specific, to DP2015-2867:

**I. What are the strengths and challenges of the proposed development?**

**Strengths:**

- 1) **Strength—Good use of materials:** high quality, durable, attractive, not competing with the "heritage" nature of the old Bridgeland School building. The trellis articulation of the end conditions of the buildings and the potential for greenery is positive.
- 2) **Strength—Townhouses:** The development provides a housing typology (townhouse) that is thought by some to be under serviced in our community, and which may provide family geared housing at a more affordable price point. (The particulars of this townhouse development are addressed in the *challenges* section below.)
- 3) **Strength—Caveat Adherence:** The development adheres to the 20' front yard setback caveat previously established on the school site.
- 4) **Strength—Landscaping.** The elbow area where the two proposed buildings meet the public park to the north is proposed to be well landscaped. Substantial efforts have been made to replace mature trees that are being removed on both 11A Street and 2 Avenue. If the proposed fencing, dividing the public park from the private development site, is constructed as indicated (post and wire), the separation between public and private lands would be physically demarcated yet visually unobtrusive and would therefore present as permeable from a pedestrian point of view. Building

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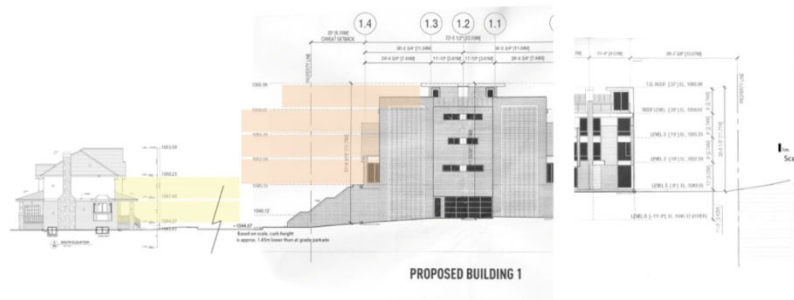
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Two's north facing units propose useful outdoor terrace/amenity space as an interface with the park, thereby providing excellent buffering. (Challenges relating to some of these same items are noted in the *challenges* section.)

- 5) **Strength—Park access:** the developer has stated that they will provide permanent public access, through private land with improved access to the park (though this poses some issue as shown in the *challenges* section).
- 6) **Strength—One-way access:** The lane through the development site has been considered to prevent headlight disturbance to existing neighboring homes.
- 7) **Strength—Fourth storey stepping:** The roof deck turret is stepped back further from the front façade of the building than required by bylaw which helps to reduce the impact of its overall height, however...

**Challenges:**

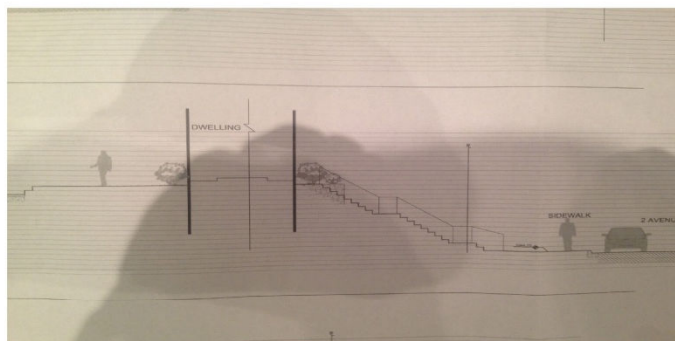
- 1) **Challenge—Grading issues and build up leading to excessive building height on 11A Street:**  
The proposed site grading is considered by most reviewers to be excessive along 11A Street. The existing grade level at the northern end of the site is, approximately, 1.6m above existing curb height, while residential RC-2 sites across the street have negative sloping. This compounds the overall height perception of the development. This height differential results in an effective main floor level of the proposed development one full storey above the existing single-family homes to the west plus an additional three storeys above that. As the building progresses south on 11A Street this grading differential increases to the point where the grade proposed approaches 4.9 m above curb height (the equivalent of almost two storeys before actual building begins). This would make the new development approximately three storeys taller than the highest point of the tallest new single-family infill residence across the street. (See the to-scale diagram below showing the equivalent height of a six-story building.)



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- 2) **Challenge—Grade build up leading to excessive building height on 2 Avenue:** The application proposes substantial grade build up along 2 Avenue NE (from current grade levels). This will add up to approximately 3.43m of additional grade height to the proposed 11.7m four storey building). This echoes the height concerns for neighbors on 11A Street.



- 3) **Challenge—Creation of an undesirable community focal point:** The proposed development will have a towering effect on the community. With the significantly built-up grading, the height of the development will compare to that of a six storey building, which is not conducive to this quadrant of the neighborhood and contrary to previously established guidelines for this section of Bridgeland. (See photo below taken with a drone set to 13.7m that represents the elevation of the proposed rooftop decks).

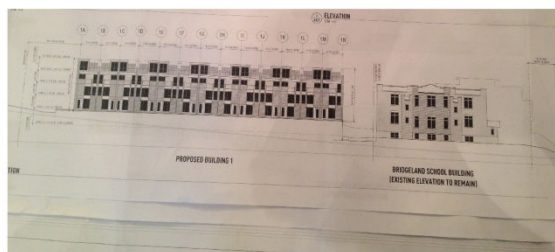


- 4) **Challenge—Pedestrian scale of the development:** The height, steep grade from curb to building, and the range of 1.6m to 4.9m of steps up from the sidewalk to the front doors of the units, combine to counteract the creation of a pedestrian-friendly facade to the streetscape.

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- 5) **Challenge—Omissions in the plans:** There are some significant omissions to the proposal which render the application difficult to assess insofar as overall impact is concerned.
- a) Although the buildings will effectively start at one to two stories above curb height, the extensive walkway stairs, which lead to front doors, and other grade retention considerations, are not shown on the elevations. These elements will impact the visual appearance of the development from the street and yet are not part of the development application.
  - b) The drawings do not accurately illustrate the building height in conjunction to the homes across the street. Grade points are not shown on either the property lines or curb to accurately show the total overall building height.



- 6) **Challenge—Incomplete/Ineffective shadow study:** The shadow cast study included in the application shows only how shadow will affect the park area to the east of the site but does not show the impact of the development on the homes to the west. With the proposed building significantly elevated above the adjacent homes, a shadow study showing morning shading would be a critical component to a complete evaluation of shadow casting. Many of the homes on the street only get morning sun due to their low-lying situation. The shadow study provided is essentially opposite of what would be valuable.
- 7) **Challenge—Parking:** There is concern about a lack of onsite parking for the overall development of this site, which would include any development of the Bridgeland School site proper (and which is not a component of this current application).
- a) We feel that the one stall per unit requirement for three bedroom homes is unrealistic. Although it fulfills the bylaw minimum requirements it does not adequately address the true expected quantity of vehicles in an area already limited by only two street frontages.
  - b) An integral component of the overall site design—the existing Bridgeland School site—is missing. The contemplated future subdivision of the school site sees minimal setbacks from the site envelope of this DP. Assuming such subdivision, there will effectively be no usable setback area on which to provide future parking (as it will relate to the Bridgeland School building redevelopment). It would reason that any parking associated with that subsequent development would need to be accommodated either on lands or structures associated with this DP, or default to on-street parking, which may lead to further parking deficiencies within the vicinity.
- 8) **Challenge—Limited future historical building use:** While not part of this application, we feel that the development and use for the historical school building is intrinsically linked with many aspects of the DP we are reviewing today. As mentioned above there are already concerns with parking which (without adequate parking/space planning) effectively limits the school building's zoning potential in deference to the lowest parking use requirement, i.e. residential. While residential has always been the developers desired original intent with respect to this building, subsequent community dissention concerning overall development of this site was met by the developer's initiative to solicit possible community and/or school uses. We have concerns that separating the overall development of the site into the two components is in effect an "end-run" around the community's initial objections and leaving no other



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possible (including economically practical) zoning for the school site but the developer's initially desired residential.

- 9) **Challenge—Safe and permanent park access:** The developer has stated to the community that public access through the site to Tyndale Park beyond will remain. To that effect, the proposal suggests pedestrian access to the park in the “elbow” between the two proposed buildings. However, the suggested access from the public streets to the elbow area is assumed to occur via the one-way roadway with no sidewalk or other delineation from traffic. We do not feel this design promotes safe access through the site. A private driveway with restricted visibility from traffic around corners is not likely to be an inviting pedestrian thoroughfare, especially insofar as park access would be desired mainly by families with children. This could possibly be ameliorated with sidewalks, pavement delineation, curbs, and specified lighting design. Additionally, we wish to understand how the developer proposes that this public park access will be a permanent provision upon the site.
- 10) **Challenge—Building One Buffering:** The east half of Building One's residential units are not provided with much buffer to the public park with only a 2.3m setback from property line to unit doors. Although this distance is more than the bylaw minimum to a property line, it does not meet street oriented design requirements, which seek patios and other at grade outdoor areas as “eyes on the street” (or in this case “eyes on the park”). These units have no room for patio or outdoor space with only a sidewalk and retaining wall. While additional amenity space may not be required, or possible with this current design configuration, there is concern that this is insufficient buffering of the development along this property line.
- 11) **Challenge—ARP Conflicts:** A number of fundamental points within the ARP are contradicted by the design of the proposed development. Assuming there are aspects of the ARP document that warrant updating, the core pillars should still apply. More specifically:
- **Page 10, Policy Implementation:** “2. That within the Conservation Area, the appropriate land uses are residential in nature and that the appropriate designation within the Land Use Bylaw would be R-2” and “4. That within the Conservation Area, where rehabilitation is not feasible, sensitive infill redevelopment of a residential nature should occur.”
  - **Page 13, Policy Implementation:** “18.1 Compatibility with existing streetscape: a) New residential developments should be compatible with the general pattern of the streetscape in terms of building height, building form and architectural massing.”
  - **Page 57, Issue 5 “Construction of New Residential Developments That are Incompatible in the Low Density Conservation Area of the Community:** “3. Development on the Escarpments a) Residential development that is not slope adaptive and that is visible from all parts of the community, Figures 4&5”

II. **Are there changes that could be made to the proposed development to make it more compatible or beneficial to the area?**

- We feel that all buildings could be reduced in height. A design consideration to accomplish this would be to remove the roof deck condition and situate the amenity space at grade with a terrace/patio in front of each unit. This would maintain the requisite amenity space, add to animation of the street from a pedestrian scale, and reduce the overall appearance of the grade berm. This would also eliminate the overlooking conditions that these current roof decks promote.
- As noted above, modifications to the one-way lane access could be provided to allow for additional, inviting and safe sidewalk access to the landscaped portions of the site and the park beyond. The setback between the existing school building and the new development could be increased or



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delineated to allow for some landscaping and a public sidewalk to fulfill the statements made by the developer for safe and improved park access.

- Many more modifications to the design COULD be made to improve buffering spaces between the required setbacks and the park yet they would likely lead to decreased unit counts, increased unit sizes and price points. The corollary being an entirely new proposed development and not really a modification to this existing one.
- Drastic changes to the existing grade COULD be made resulting in the removal of the proposed elevated grade levels thereby permitting the entire development to be lowered to more appropriate heights sensitive to neighboring houses. This might mean that parking could be completely underground (i.e. excavated lower) and expanded to contain requisite parking for the subsequent development of the Bridgeland School building. There are numerous design options that could accomplish this goal, including stepping front and back units, completely lowering the building while providing parking access under the "elbow" park area between the buildings or other hybrid ideas. While this would ameliorate certain challenges posed by the site with respect to heights, we also fully understand that this would likely mean an entirely new development proposal.

**III. Provide comments on:**

- a. **The use (if identified—not applicable for single detached houses, semi-detached dwellings or duplexes).**
  - In general our Committee finds that the addition of the townhouse typology to a contiguous larger parcel capable of accommodating such a development acceptable (in principle) and amenable to the existing housing typology in the area. Stated more simply, townhouse development does seem to fit suitably within a densified Bridgeland-Riverside. Not having the benefit of knowing the proposed development for the school building proper, we cannot accurately comment on how the whole development will fit within the existing context.
- b. **The site design**
  - We see the developer's desire to create a level site for the their construction budget. While cost-effective, this design solution exacerbates the grade and height challenges, increasing the impact on the neighboring residents, leading to the many issues highlighted above.
  - Significant questions regarding parking for both the development itself and the subsequent Bridgeland School site are raised and not addressed.
- c. **The building design**
  - Given that height and shadowing are major concerns, (in addition to the ideas above) perhaps breaking the linear buildings into separate structures instead of one long structure would improve light permeability into the adjacent streets and ameliorate overshadowing (based on heights) for neighbors on 11A Street and 2 Avenue. Again we recognize that this is not really a modification to the existing DP but would mean an entire redesign of the proposal.
  - The Committee notes that the developer responded to neighborhood concerns about the school lands being retained as a community amenity but has great concerns about the developer's long-term intent for this site. The committee is disappointed that the Expression of Interest for the school site was not made public and is very cautious and wary of how this is proceeding separately from the DP.
  - All other comments regarding the building design have been addressed above

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**IV. Has the applicant discussed the development permit application with the Community Association? If yes, what information was provided?**

- Yes. The applicant met with the previous Planning Committee in July 2014. The current committee has essentially no knowledge as to the content of those interactions.
- A public Open House, where the greater community was invited to comment on development designs, was hosted by the applicant in the spring. However, there have been numerous complaints from residents regarding lack of notice, raising the question as to whether advertising was done sufficiently and/or accurately and which may have lead to a smaller Open House attendance. The result of which was an overall ineffective community engagement process.
- The applicant presented to the Planning Committee on 06 August 2015 (at the invitation of the Planning Committee) to provide an overview of the development in facilitating our review of the DP application (in preparation for issuance of this comment letter). The applicant was asked to point out changes they had made to their development plans as a result of the community engagement process and from the feedback obtained in the Open House. In those engagements, height, privacy, overlooking, site grade, parking, site access, and playground issues were raised and documented by the applicant. The only subsequent and observable change to the design addressed some concern regarding the end articulation of the buildings. The committee is disappointed with the lack of regard to the feedback given, and to the engagement process in general. The lack of concern for the issues raised in numerous forums raises questions regarding the applicant's objectives in building within the context of the community and their commitment to helping develop a project that is beneficial to and integrates with the community as a whole.

**V. Please provide any additional comments or concerns regarding the proposed development.**

- While we are not opposed to the general flavor of townhouses on this site, ASSUMING the approval of the conjoined land use change (perhaps the larger or more controversial issue and upon which this letter does not comment) the proposed development illustrated in this DP application does pose a large number of major challenges.
- Given the significant quantity and nature of the challenges posed by this application we feel that the development (as proposed) is not a good fit for this site.
- It is our understanding that several individual Bridgeland residents have provided personal comments directly to the file manager.

Sincerely,



Kirsten Dow-Pearce  
Bridgeland Riverside Community Association

Per: Ali McMillan, Planning Director, Bridgeland Riverside Community Association  
Joe Belland, Chair Development Sub-Committee, Bridgeland Riverside Community Association

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APPENDIX VI  
DEVELOPMENT PERMIT



POLICY AMENDMENT AND LAND USE AMENDMENT  
BRIDGELAND/RIVERSIDE (WARD 9)  
NE CORNER OF 11A STREET NE AND 2 AVENUE NE  
BYLAWS 7P2016 AND 36D2016

MAP 23C

nyhoff  
architecture

BRIDGELAND  
TOWNHOMES  
DEVELOPMENT  
PERMIT SET  
11A STREET NE, CALGARY, AB  
2016.03.01.001

MATERIALS PALETTE:



**PRELIMINARY BYLAW ANALYSIS**

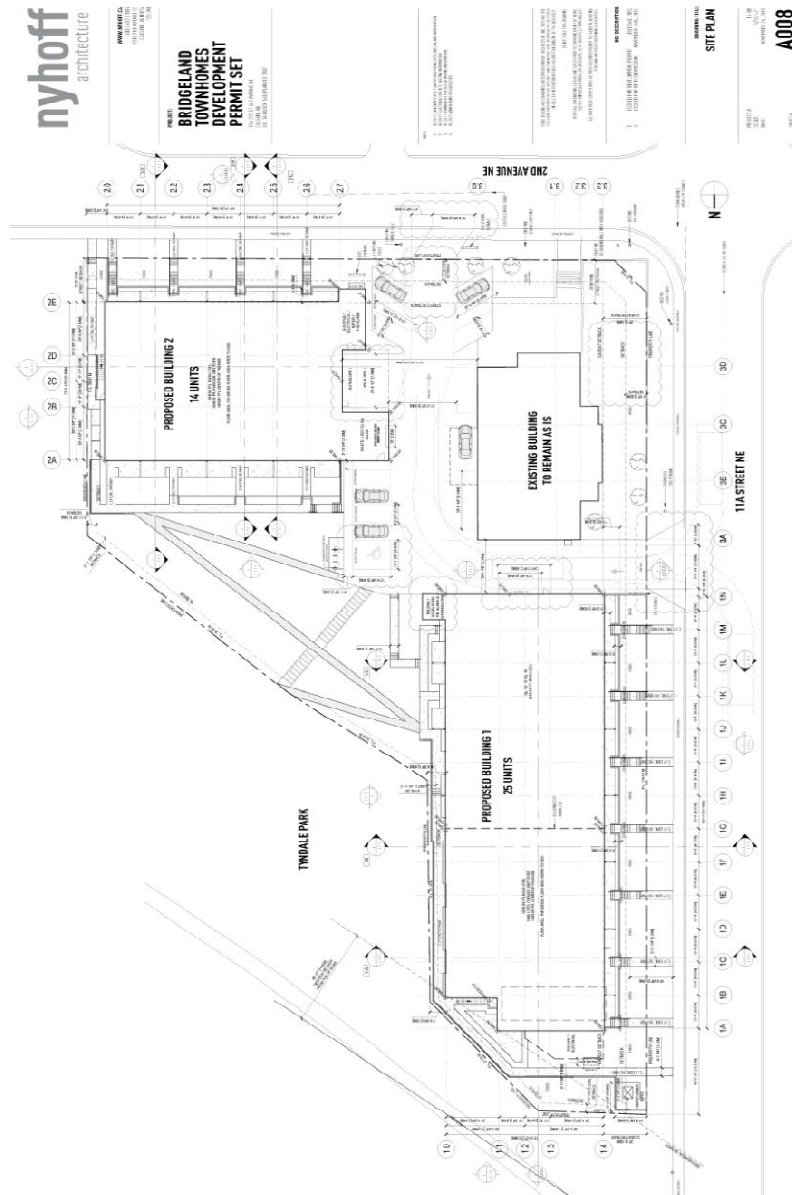
BYLAW	SECTION	DESCRIPTION	COMPLIANCE
7P2016	1.0	GENERAL PURPOSE	COMPLIANT
7P2016	2.0	LAND USE	COMPLIANT
7P2016	3.0	DEVELOPMENT	COMPLIANT
7P2016	4.0	DESIGN	COMPLIANT
7P2016	5.0	ENVIRONMENTAL	COMPLIANT
7P2016	6.0	TRANSPORTATION	COMPLIANT
7P2016	7.0	UTILITIES	COMPLIANT
7P2016	8.0	RECREATION	COMPLIANT
7P2016	9.0	HERITAGE	COMPLIANT
7P2016	10.0	GENERAL	COMPLIANT
7P2016	11.0	ADDITIONAL	COMPLIANT
7P2016	12.0	TRANSITIONAL	COMPLIANT
7P2016	13.0	TRANSITIONAL	COMPLIANT
7P2016	14.0	TRANSITIONAL	COMPLIANT
7P2016	15.0	TRANSITIONAL	COMPLIANT
7P2016	16.0	TRANSITIONAL	COMPLIANT
7P2016	17.0	TRANSITIONAL	COMPLIANT
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7P2016	19.0	TRANSITIONAL	COMPLIANT
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7P2016	21.0	TRANSITIONAL	COMPLIANT
7P2016	22.0	TRANSITIONAL	COMPLIANT
7P2016	23.0	TRANSITIONAL	COMPLIANT
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7P2016	25.0	TRANSITIONAL	COMPLIANT
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7P2016	98.0	TRANSITIONAL	COMPLIANT
7P2016	99.0	TRANSITIONAL	COMPLIANT
7P2016	100.0	TRANSITIONAL	COMPLIANT

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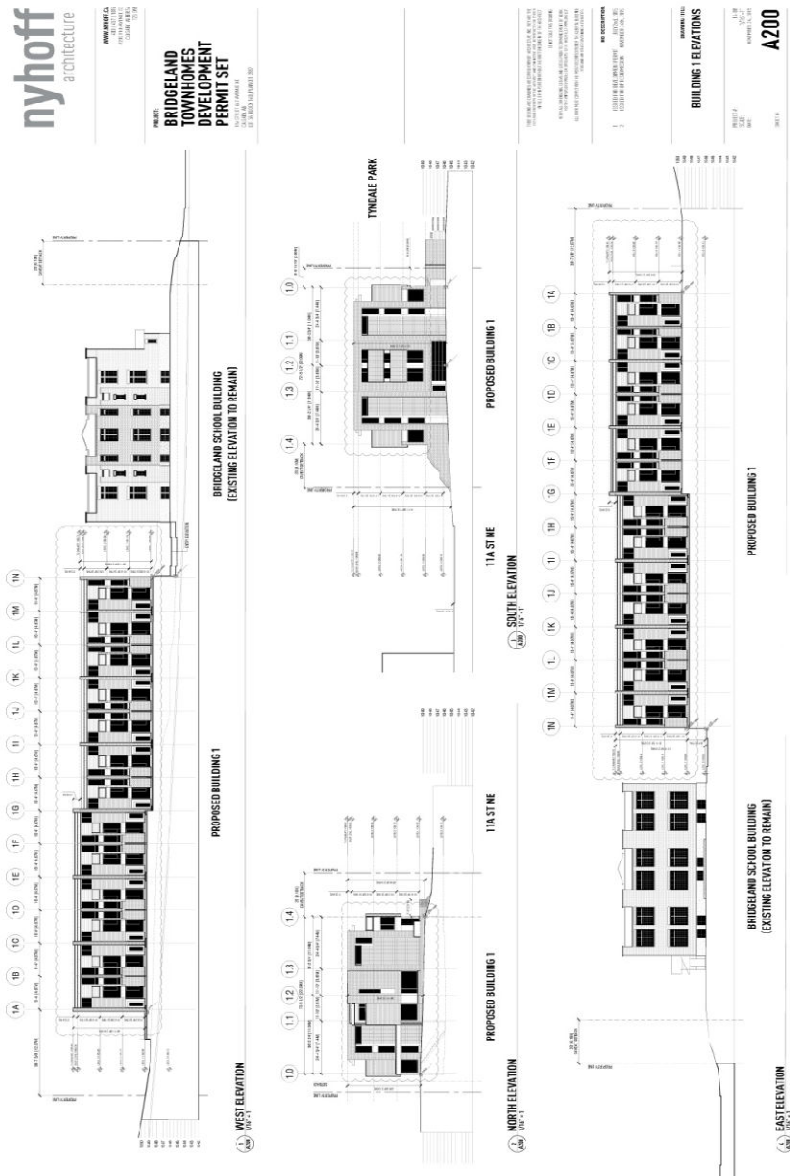
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