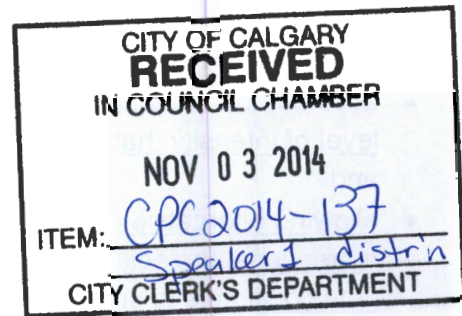




ARCHITECTURE
INTERIOR DESIGN
MASTER PLANNING
URBAN PLANNING

ARUP DATTA ARCHITECT LTD.



Reference to LOC2014-0026

Land Use Amendment

Stoney 2 (Ward 3)

East of Deerfoot Trail and south of Country Hills Boulevard NE

Response to Reasons for Refusal by the Calgary Planning Commission, September 25, 2014 Meeting

1. Reasons for Refusal recommendation from CPC member Mr. Wright

The application does not meet the principles of the ASP

- a) The range of uses do not support the notion that specialized development projects serve the Airport (p. 7)
- b) Did not submit a trip generation review at the land use stage (p. 71)
- c) Did not submit market demand analysis and impact analysis as per ASP (p. 13)
- d) Exceeds maximum size of 1.6 hectares at one or more corners of the intersection (p. 20)

Airport lands are unique and key industrial development and commercial conversions on an incremental basis erode that focus. The City has invested significant capital dollars in infrastructure and uses should take advantage of the strategic locations attribute of the area, rather than allow for uses that can be more flexible in spatial choice.

Response to Reasons for Refusal:

- a) The term ***“specialized development projects”*** is extracted from the Revised Stoney Industrial Area Structure Plan, Paragraph 3.2.2. ***“Viable Industrial Base”*** 3.2.2 ***“...the area will likely attract specialized development projects that serve the Calgary International Airport...”*** ***which is a desire but not a requirement.***

The paragraph in total states:

3.2.2 Viable Industrial Base

The Stoney Industrial Area will function as predominantly a business and industrial area. At the same time, the area will likely attract specialized development projects that serve the Calgary International Airport, the traveling public, the local work force and the residential communities to the west. Thus, retaining a viable industrial base while recognizing the

potential diversity of the area remains a key emphasize of the plan. This will be achieved in two ways:

- accommodating a diversity of industrial and other business-related development at a level of intensity that is determined appropriate to ensure economic viability of the area, and
- allowing alternative complementary retail and service commercial, institutional and recreational projects to develop on a limited and select basis where transportation network is able to support these projects.

The change to I-C District from I-G District retains 51 of the 71 of the "I-G District uses" and adds 20 addition uses.

Uses listed in I-G District and not listed in I-C District are Catering, Crematorium, Distribution Center, Fleet Service, which are uses that may or may not support "Specialized Development Projects" however I-C District includes additional uses such as Fitness Centre, Indoor Recreation Facility, Information & Service Provider, Industrial Facility, Vehicle Rental minor & major which may be more suitable to support Specialized Development Projects that serve the Calgary International Airports and travellers.

- b) With reference to the statement ***that a trip generation review was not submitted*** appears to be based on an assumption of what development is planned. Section 6.0 Planning Cell Policies and 6.1.1 Purpose states "The purpose of these policies is to provide for the comprehensive and coordinated development of land on a planning cell basis with the Stoney Industrial Area. The planning cells will function as the basic unit of analysis within the area. Accordingly, land use, transportation and servicing studies should apply to an entire cell and not an individual site. In addition, landowners will be encouraged to cooperate in terms of their individual development initiatives with a cell and, should be provided an opportunity to review the various development proposals with a cell that may impact their lands.

And 6.1.2 (2) "In accordance with subsection (1), unless determined otherwise, a land use, transportation or servicing study required in conjunction with an Outline Plan/Land Use application should be undertaken on a planning cell rather than for an individual site within a cell.

Also the Revised Stoney Industrial Area Structure Plan Section 15.3.2 (1) (ii) and (iii) also identify requirements for Trip Generation Review s is addressed as follows:

The change to I-C District from I-G District retains 51 of the 71 of the "I-G District uses" and adds 20 addition uses. Therefore the 51 uses currently approved under I-G District are acceptable within the Cell and the additional

uses under I-C District can be addressed at the time of a Development Permit Application.

As no specific development is proposed with this redesignation application there is no basis on which to create a study and increased traffic generation was addressed in the submission to CPC. As stated in the Administration Report to Calgary Planning commission, 2014 September 2014 "...A Transportation Impact Assessment (TIA) or Parking Study was not required for this land use redesignation application, but a TIA may be required at the Development Permit stage..."

- c) With reference to the statement ***that a market demand analysis and impact analysis was not submitted*** appears to be based on an assumption of what development is planned.

Section 6.0 Planning Cell Policies and 6.1.1 Purpose states "The purpose of these policies is to provide for the comprehensive and coordinated development of land on a planning cell basis with the Stoney Industrial Area. The planning cells will function as the basic unit of analysis within the area. Accordingly, land use, transportation and servicing studies should apply to an entire cell and not an individual site." In addition, landowners will be encouraged to cooperate in terms of their individual development initiatives with a cell and, should be provided an opportunity to review the various development proposals with a cell that may impact their lands.

As no specific development is proposed with this redesignation application there is no basis on which to create a market demand analysis and impact analysis studies and the change to I-C District from I-G District retains 51 of the 71 of the "I-G District uses" and adds 20 addition uses. Therefore the 51 uses currently approved under I-G District are acceptable within the Cell and the additional uses under I-C District can be addressed at the time of a Development Permit Application.

- d) With reference to ***"Exceeds maximum size of 1.6 hectares..."*** appears to be a reference to Section 8.1.2 (2) (a) Development within Business/Industrial Area. Local Commercial uses within the Business/Industrial Area and specifically addresses "Local Commercial Uses" and based on the Policy if a local Commercial uses was proposed it would not be approved.

Reading further in the same section 8.1.2 (2) (b) – **a service commercial use shall only locate on a site**

- (i) With efficient access and good visibility lying adjacent or in close proximity to an entranceway road, and
- (ii) **Not exceeding 4.0 hectares in size**

With reference to Section 17.2 (13) Service Commercial Use definition uses permitted in I-C District or I-G District could only be restaurants and convenience grocery stores.

And further

8.1.2. (2) (c) **Medium Industrial uses** within the Business/Industrial Area **should not** locate a use

(i) **Adjacent to**

(a) **An entrance way road which per 17.1 (7) Country Hills Boulevard is defined an Entranceway Road & per 17.2 (7) would limit another use permitted in the 1-G District.**

Refusing the land redesignation application because a specific lot size was exceeded without reference to the full context of the reference and no reference to what could be approved is very selective & appears to have been referenced to create a false impression of the logic of the application being recommended for approval by the planning department.

Mr. Wright Statement "Airport lands are unique and key industrial development and commercial conversions on an incremental basis erode that focus...."

The current zoning on these two sites is Industrial – General (I-G) District the purpose for this zoning is intended to be characterized by:

- a. *a wide variety of light and medium general industrial uses and a limited number of support commercial uses;*
- b. **parcels typically located in internal locations;**
- c. **the application of discretion for parcels that share a property line with a major street** or expressway to ensure an appropriate interface and compliance with City plans and policies;
- d. *a limited number of non-industrial uses that may be appropriate due to building or parcel requirements generally found in industrial areas;*
- e. **uses and buildings that may have little or no relationship to adjacent parcels;**
- f. **appropriate controls to ensure screening of any outdoor activities;** and
- g. *limits on sales and office activities in order to preserve a diverse industrial land base.*

Industrial Commercial (I-C) District the purpose of this zoning is intended to be characterized by:

- a. **Locations on the perimeter of industrial areas, along major streets or expressways;**
- b. *Light industrial uses that are unlimited in size;*
- c. *Small scale commercial uses that are compatible with and complement light industrial uses;*
- d. **Controls to ensure that developments provide a transition between other land use districts and the Industrial – General District or between highly visible industrial parcels and the Industrial – General District;**
- e. **Setbacks, screening, landscaping and building design that addresses aesthetic concerns associated with highly visible locations; and**
- f. **Parcels located within 200.0 metres of a major street or expressway;**

Any development on these sites should be uses that will benefit from the exposure and provide a positive image to Country Hills Blvd NE. The uses permitted and discretionary in Industrial General (I-G) District generally do not require high visibility and have little or no relationship to existing developments on the adjacent sites therefore these two sites are more appropriate as Industrial Commercial (I-C) District

2. Reasons for Refusal recommendation from CPC member Mr. Logan

"The land use redesignation serves to erode the employment generation in the area, increase traffic generation and competes with multiple commercial sites along the same corridor."

Response to Reasons for Refusal:

This statement of reasons for refusal states generalities without supporting reference to substantiate the reasons.

- * With reference to employment generation the I-G District includes numerous uses that usually require minimal staff requirements which do little to support employment generation such as Crematorium, Parking lot - grade & structure, Vehicle storage – large, Passenger & Recreational, Equipment yard, Storage yard, Salvage yard, & Kennel as examples. **Whereas the I-C District replaces these uses with commercial uses that provide service and potentially support more employment generation.**
- * Increased traffic generation was addressed in the submission to CPC. As stated in the Administration Report to Calgary Planning commission, 2014 September 2014 "...A **Transportation Impact Assessment (TIA) or Parking Study was not required for this land use redesignation application, but a TIA may be required at the Development Permit stage...**"

- * The premise that a change to I-C District will compete with multiple commercial sites along the same corridor is not a City of Calgary policy addressed in the Land Use Bylaw or the Revised Stoney Industrial Area Structure Plan. The Revised Stoney Industrial Area Structure Plan, Paragraph 3.2.2. "Viable Industrial Base" states the "The Stoney Industrial Area will function as predominantly a business and industrial area...." "...accommodating a diversity of industrial and other business-related development at a level of intensity that is determined appropriate to ensure economic viability of the area, and..." "... allowing alternative complementary retail and service commercial, institutional and recreational projects to develop on a limited and selected basis where the transportation network is able to support these project..."

3. Reasons for Refusal recommendation from CPC member Ms. Wade

"The ASP requires market analysis and demand which has not been undertaken"

"In order to avoid incremental redesignation we need to understand land supply in area that will generate employment that meets MDP policies."

"The economics of land supply needs to be addressed as per the ASP"

"Recommend that this analysis be undertaken to determine both employment generation and retention of service in this area, to return spending to the area."

Response to Reasons for Refusal:

With reference to the statement one "***The ASP requires market analysis and demand ...***" appears to be based on an assumption of what development is planned.

Section 6.0 Planning Cell Policies and 6.1.1 Purpose states "The purpose of these policies is to provide for the comprehensive and coordinated development of land on a planning cell basis with the Stoney Industrial Area. The planning cells will function as the basic unit of analysis within the area. Accordingly, land use, transportation and servicing studies should apply to an entire cell and not an individual site." In addition, landowners will be encouraged to cooperate in terms of their individual development initiatives with a cell and, should be provided an opportunity to review the various development proposals with a cell that may impact their lands.

As no specific development is proposed with this redesignation application there is no basis on which to create a market demand analysis and impact analysis studies and the change to I-C District from I-G District retains 51 of the 71 of the "I-G District uses" and adds 20 addition uses. Therefore the 51 uses currently approved under I-G District are acceptable within the Cell and the additional uses under I-C District can be addressed at the time of a Development Permit Application.

With reference to the statements two, three and four ***“...generate employment...”,
“...economics of land supply ...” and “...employment generation and retention of
service in this area, to return spending to the area ...”*** appears to be based on an
assumption of what development is planned.

**The I-G District includes numerous uses that usually require minimal staff
requirements which do little to support employment generation such as
Crematorium, Parking lot - grade & structure, Vehicle storage - large, Passenger &
Recreational, Equipment yard, Storage yard, Salvage yard, & Kernel as examples.
Whereas the I-C District replaces these uses with commercial uses that provide
service and potentially support more employment generation.**

Respectfully submitted

Brian Dennis, Senior Project Manager

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