

# Calgary Planning Commission Member Comments



For CPC2025-0267 / LOC2024-0113  
heard at Calgary Planning Commission  
Meeting 2025 March 13



Member	Reasons for Decision or Comments
<p><b>Commissioner Montgomery</b></p>	<p>Reasons for Approval</p> <ul style="list-style-type: none"> <li>• The site location does not pose a design problem for the ASP as it is against a major road, does not intersect any major intersection identified in the ERCS, follows policy with ERCS on approvals without ASP's.</li> <li>• The timeline to begin an ASP in this area was unknown. Administration identified an ASP timeline as 2 – 3 years from start. With an unknown start of the ASP this is an indefinite timeline.</li> <li>• Identifies a need for a faster more efficient ASP process that keeps up with demand.</li> <li>• Places of Worship are seen as an essential service by many Calgarians.</li> <li>• Given the ownership of the site and the proposed uses, I believe this land use to be acceptable at this time and allow the applicant to move to a more detailed level of planning through the DP process.</li> </ul>
<p><b>Commissioner Damiani</b></p>	<p>Reasons for Approval</p> <ul style="list-style-type: none"> <li>• Recognition of challenges to find appropriate land parcels within the planned land areas to support the proposed uses. The site is adjacent existing development within an area awaiting an Area Structure Plan. It is a logical location for future development.</li> </ul> <p>Applicant is participating in the Area Structure Plan request process with surrounding landowners. This has involved collaboration amongst landowners in a coordinated approach to future land use and servicing, with consideration of the proposed uses.</p> <p>The regional policy indicates the lands to be “Residential”, within which the proposed uses are considered to be appropriate. Timing of the future ASP policy is uncertain and could mean that the proposed uses that have high community demand could remain unprovided for an indefinite amount of time. The proposal allows for a phased approach to meet community needs.</p>

	<p>The subject parcel boundaries are set to the north and west by major transportation corridor, Highway 22X and storm infrastructure. A temporary fire station will be built north of 22X within the next five years. Meeting of fire requirements are an expected requirement at DP.</p> <p>The Development Authority manages appropriate scale, intensity and design of any future developments through the Development Permit process and requirements. Interim solutions require Administration review and approval during the DP process to provide on-site water, sanitary, storage for stormwater and fire protection at the developer's expense.</p> <p>The space required for on-site infrastructure and construction and operation costs of interim servicing will be considerable factors for the applicant to undertake and balance with the proposed intensity of development on the site prior to connecting into city servicing. Deferred Servicing Agreements can be used to require connection into future city services and levy payments.</p>
<p><b>Commissioner Hawryluk</b></p>	<p>Reasons for Approval</p> <ul style="list-style-type: none"> <li>Administration recommended refusing this application because an Area Structure Plan (ASP) has not been initiated and the site is unserviced. The Planning Commission changed that recommendation to approval with 8 in favour and 3 opposed. I was in favour.</li> </ul> <p>In 2013, Council approved a Direct Control (DC) District that is based on the Special Purpose – Future Urban Development (S-FUD) District with the additional discretionary use of Tree Farm and to allow one future subdivision.</p> <p>The proposed DC District is based on S-FUD and would remove the discretionary use of Tree Farm add the following discretionary uses: Child Care Service, Food Kiosk, Instructional Facility, Place of Worship – Large, Place of Worship – Medium, Place of Worship – Small, School – Private, Service Organization and Social Organization. It would set a parcel minimum to prevent future subdivisions prior to servicing and a maximum building height of 25m.</p> <p>The Risk Section of the Cover Report states, “Approval of this land use amendment prior to local area policy, which guides future development vision, land use, financial considerations and municipal infrastructure, may negatively impact the ability to realize efficient urban planning in the future and achieve the best community outcomes. There is risk in approving permanent development in an un-serviced area in advance of</p>

proper overall analysis and planning for the area” (Cover Report, page 4).

When asked about the risk section, Administration offered some known unknowns like greater difficulty to do levies, deferred servicing agreements, and cost sharing agreements if this application was approved before the ASP. Administration notes, "Allowing development in advance of municipal servicing may hinder the ability to construct and finance servicing in the future; this may be due to the placement of structures on the site, location of interim servicing infrastructure and future road patterns and servicing mains that may not align with what is developed on the site now" (Attachment 1, page 5).

Administration also notes unknown unknowns may arise depending on what decisions are made during the ASP process. The next batch of ASPs, if approved, could begin in 2026. It would likely take 2-3 years to complete an ASP, which it might return to Council 2028 or 2029. If the ASP was approved, servicing might not occur until the 2030s.

During debate, one Commissioner suggested another risk: a recommendation to approve this application might signal support for an ASP in this area, which would carry infrastructure costs that are currently unknown.

The S-FUD District is intended to “provide for a limited range of temporary uses that can easily be removed when land is redesignated to allow for urban forms of development” (LUB, 2007, 1085(c)). DCs based on S-FUD have supported detached houses with wells and septic tanks. In this case, structures like ATCO trailers or a Sprung Structure (as the Applicant has suggested) could be appropriate.

Because the parcel lacks services, the Applicant would need to provide their own interim servicing for the duration of this Land Use. The Applicant has proposed using onsite stormwater and fire protection water. They would truck in and fill tanks for potable water and hold sanitary water, which would need to be trucked out.

Administration would like to wait on any development in this area until comprehensive planning has been completed and fear that this application might contribute to fragmented planning. This quarter section has a number of country residential developments, which has already produced fragmented ownership. Unless a single owner reconsolidates the quarter section, fragmented planning is the most likely option on this quarter section. That fragmented ownership also

limits how much development is possible before an ASP. This is especially true because 100m to the south lies a parcel with the Special Purpose – Community Institution (S-CI) District (see Attachment 1, page 1). During Commission’s review, Administration gave some background on that Land Use: In 2013, Administration recommended refusing a Land Use Amendment to allow a Place of Worship. Council approved the Land Use. In 2019, the Development Permit was approved. In 2025, a building is under construction. Because the proposed DC is based on S-FUD and acknowledges the lack of servicing, Administration suggested the proposed DC District is a better option than the S-CI District that was approved to the south. While Administration would prefer to conduct comprehensive planning, the fragmented nature of this quarter section and the existing S-CI District may have let that horse out of the barn.

Section 3.6.2(a) of the MDP requires that Administration refuse applications prior to the approval of an ASP. The East Regional Context Study supports limited uses in this area like crop-based intensive agriculture to encourage local food production, temporary uses or uses that will not compromise future urban growth in any way. This supports the refusal. However, Commission can change Administration’s recommendation to Council.

I have two concerns with approving this application:

1. The site is a portion (8.09 hectare) of the full parcel. The Applicant said they do not need more of the parcel for their needs, but the proposed parcel is separated from the logical access point on 104 St. The Applicant may be able to find a solution with the owner of the parcel to the east, but it probably would have made more sense for the parcel to include a connection with 104 St. One wonders if a future application will be necessary with a larger parcel.
2. The East Regional Context Study marks this area as residential (Map 3: Land Use Concept & Transportation). During Commission’s review, the Applicant used the term “neighbourhood activity centre.” Because an ASP has not been initiated, it is too early to be sure that this would be a Neighbourhood Activity Centre.

With Administration’s recommendation to refuse and my concerns, why did I support changing the recommendation to approval?

1. The site’s location within the area and the quarter section. This site is not isolated in the middle of the East Regional

	<p>Context Study area or the quarter section. It is adjacent to 22X and has obvious access from 104 St SE. These kinds of uses in temporary buildings seem unlikely to cause fundamental problems to future planning.</p> <ol style="list-style-type: none"><li data-bbox="602 380 1406 611">2. During Commission's review, I asked Administration about their worst-case scenario. The worst-case scenarios that I can imagine would involve fundamental shifts in how Calgary grows that would influence future ASPs, limit future planning, and hinder future servicing. In that case, any future facilities on this site would remain self-sufficient but slightly isolated in temporary building(s).</li><li data-bbox="602 646 1419 1089">3. Historically, places of worship and service organizations were found in residential areas, which is what the East Regional Context Study marks this area. Administration notes that "these uses are generally integrated into communities" (Cover Report, page 3). However, after World War II, those uses were increasingly separated from where people live. This led to the rise of access-driven locations for places of worship and social organizations, which has tended to push them to commercial and industrial areas. It appears that the Applicant's response has been to buy a piece of land near the edge of town and wait for Calgary to grow towards them, which may integrate these uses with a residential area.</li></ol>
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