

## FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] Christine

Last name [required] Halasa

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

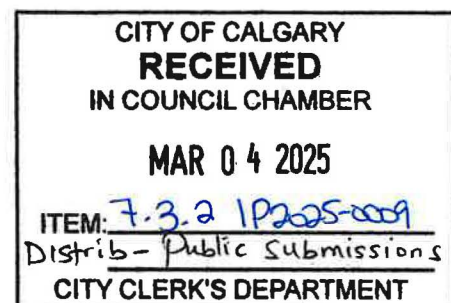
What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Communities Local Area Plan Referral

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT\_01\_FILENAME

Riley LAP Comments 25.02.27.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)





## **Riley Communities Local Area Plan**

In the plan as presented there is no apparent careful thought or consideration of the policies and principles of the existing city's own recommendations as in their Municipal Development Plan and Transit Oriented Guidelines. There is especially no evidence of any significant consideration or engagement of the existing community or any attempt that "addresses local character , community needs and appropriate development transitions with existing neighbourhoods".

Some examples of this include identifying quiet residential streets as neighbourhood connectors and the insertion of multiple four storey, and especially six storey and higher structures that in no way fit in with the character of the neighbourhood. An area of potential higher density at North Hill mall exists and could be densified without so much ill effect on the neighbourhood. It seems the intent is to have a wasteland of higher buildings and towers with minimal respite in the form of green spaces and trees.

There are no changes incorporated as suggested by the community with regards to supporting pedestrian flow or the mobility study.

There is little attractive or inspiring about the plan as presented and instead seems to aspire to turn Calgary into a dull, cold and uninspiring city.

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First name [required] **Paul**

Last name [required] **Kaethler**

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Date of meeting [required] **Mar 4, 2025**

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[required] - max 75 characters **Item 7.3.2: Riley Communities Local Area Plan**

Are you in favour or opposition of the issue? [required] **In opposition**

ATTACHMENT\_01\_FILENAME

Comments - Riley Local Area Plan.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters.)

Briar Hill / Hounsfield Heights is a quiet area; we're not looking for the type of build up that you are considering. We aren't against development but we aren't for 12 storey buildings and we aren't for the amount of parking and traffic headaches that this will bring. In particular the North part of Hounsfield Heights does not have the access required for this. 13th Avenue isn't even paved!

## Comments regarding the Riley Local Area Plan:

I am unhappy with the changes from the May 2024 to December 2024 Building Scale documents and the direction of the Local Area Plan. There seems to be a fixation on the corridor from Lions Park C-train to SAIT along the North side of Hounsfield Heights.

As one of the people living in the new "4-storey" areas, I'd like to voice my displeasure with this. Yes, I understand that your desire to add density to the area, and largely, I support that (in an area appropriate manner - perhaps semi-detached homes, 4 storey along major routes). More homes means more local folks means more and better businesses and services - but why here? The streets near (in particular) the Lions Park Playground (16<sup>th</sup>, 16A, 15<sup>th</sup>) are very quiet established residential streets. We do not want the additional traffic that 4 storey buildings would bring, nor the increased parking issues, nor the shade from large buildings, reduction in tree cover, nor the (very) probable reduction in property values.

I get the proximity to SAIT and the CTrain station, again, why here? These are fairly expensive locations where residents have chosen to spend the extra money to stay away from exactly what you are proposing. Will the City compensate me for what will surely be a reduction in my property value? Are you also pushing this at Banff Trail? Are the same rezonings being considered in Sunnyside and Hillhurst, Bankview? Surely closer proximity to downtown would be more appealing.

Looking at the area towards 19<sup>th</sup> Street and closer to North Hill Mall - are you really serious that a 12 storey building would be appropriate there? Perhaps down in Kensington, but to my recollection, every development that has reached that high has been denied. It would look even more ludicrous here. Again, and I can't stress this enough, this is a quiet residential area. This is NOT 17<sup>th</sup> Avenue or Kensington, or Bankview. We DO NOT want this type of development; it would completely destroy the nature of the neighbourhood.

If you must focus on something, how about incenting development at the old Sears site (North Hill Mall)? Lots of great land there without disrupting our quiet happy little neighbourhood. Or the remainder of the vacant lots along 16<sup>th</sup> Avenue. Or the empty lot on 10 Street southwest of the Safeway. Or the empty lot where the old CBC building used to be. There seems to be plenty of land...maybe Council needs the ability to encourage (read: force) developers to stop sitting on these plots and actually do something! I get that they need to make some (too much?) money on these developments...but are you completely powerless here? If so, you need to fix that.

Please reconsider this seemingly drastic change in Briar Hill/Hounsfield Heights.

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First name [required] Robert

Last name [required] Keith

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Date of meeting [required] Mar 4, 2025

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[required] - max 75 characters Riley LAP

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I attended the Planning Committee meeting regarding the LAP and learned that developers and people living outside the affected area were given more voice and exclusive meetings with Administration to push their agendas. I learned that some of the Counsellors on the Committee feel that density ONLY belongs in the Riley LAP area. This is false. Density needs to occur where appropriate across the entire city. My concerns were not adequately addressed.

These are:

- failure to consider the LISTED HERITAGE ASSET Riley Park by reducing height, overshadowing and overlooking by any future development on 5th Ave NW (South edge of Riley Park)
- failure to demand that shadow studies accompany all proposals for new development
- this is very easy to do and should be MANDATORY.
- failure to prevent truly insensitive development from impacting existing residences, including Heritage Designated areas

While increased density in the affected area is expected, efforts need to be made and enforced when it comes to negative impact on the existing residents and businesses. The plan is ALMOST ready to go but needs a few small adjustments to reflect these concerns.

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First name [required] **Robert**

Last name [required] **Mc Laughlin**

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What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

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[required] - max 75 characters **Riley Local Area Plan**

Are you in favour or opposition of the issue? [required] **In opposition**



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Property owner and resident in Hounsfield Heights. OPPOSE the Riley Local Area Plan as currently proposed by the City of Calgary. Density massively out of proportion to the neighbourhoods character and ability to support same. Fully support the stance being taken by Hounsfield Heights Briar Hill Community Association, its board, planning subcommittee and resident membership as thoughtfully outlined in its submission, observations and recommendations to Council re the RLAP.

Buildings up to 12 storeys high especially along 14th street and south of the C train tracks on 13th Avenue will increase traffic movement and congestion WITHIN the neighbourhood on a massive scale, especially given the lack of direct access onto 14th Street, a thorough fare already bursting at the seams with the current scale of vehicular traffic.

This" rush to housing density " in our neighbourhood must be rejected in its current iteration and sent back to the City for review and a fresh approach of LOWER and SUSTAINABLE density adopted such that the area can support the increased demands of people, traffic etc on it  
Robert Mc Laughlin, 1604 10th Avenue NW

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First name [required]

Mark

Last name [required]

Hardy

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Council

Date of meeting [required]

Mar 4, 2025

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[required] - max 75 characters

Riley LAP

Are you in favour or opposition of the issue? [required]

In opposition

ATTACHMENT\_01\_FILENAME

Council Comments March 2025.docx

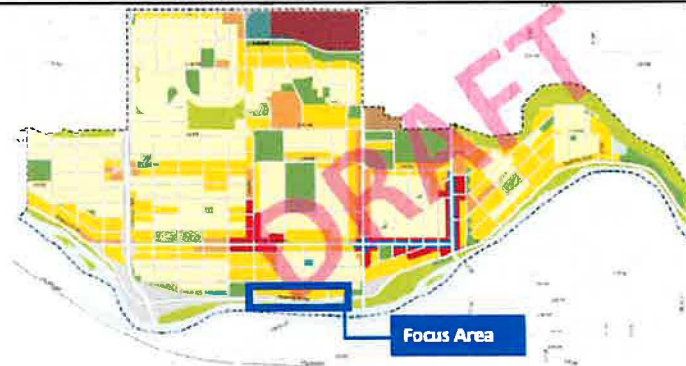
ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters.)

- 1) There is known creosote contamination in area proximate to Westmount Boulevard and Broadview Road between 19th and 14th Ave NW.
- 2) There is no specific policy in place to guide development proximate to creosote contamination and a very disjointed process between the city and the province for handling contamination in urban areas.
- 3) The Riley LAP does not mention or consider this underlying condition in any manner and therefore ignores important development constraints for areas effected by contamination.
- 4) Conversation with both the City and Province regarding contamination in the area have left residents feeling concerned that both levels of government are not taking the residents health and tax payer liability risks seriously. Furthermore City administration are confused and or are not forthright in sharing information with concerned citizens.
- 5) The Riley LAP should not be accepted by council until these creosote contamination concerns are properly addressed, the health and liability risks are understood and communicated to community members, and the development constraints are accurately reflect within the LAP document.

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



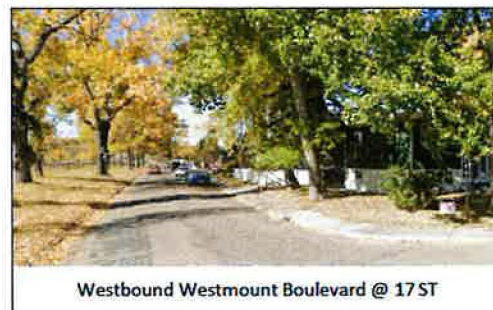
### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
  - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



Westbound Memorial Dr/Westmount Blvd @ 17 ST

- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



Eastbound Memorial Drive @ 14 ST NW – lane closure infrastructure

- downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**

- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



No space for a pedestrian overpass at this location

- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.



- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern



## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### **1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. *They considered this a petition and dismissed the substantial feedback from 18 households.* For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.

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First name [required] **James**

Last name [required] **Hope**

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What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Land Use Bylaw 1P2007**

Are you in favour or opposition of the issue? [required] **In opposition**

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

i am in opposition as i did not get due notice of this meeting as information was recieved via mail on Wed Feb 26 this was after i was was allowed to submit comments that were closed on Tue Feb 25 2025. this does appear to be very fair or transparent. this meeting should be postponed to allow affected residents to review and comment. in addition i would like to know why address 1608 and 1609 Bowness Road NW are not included in this package as they are at the end of the street and very much part of our block.

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First name [required] **Kyle**

Last name [required] **Hanson**

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[required] - max 75 characters **RILEY PARK LAP**

Are you in favour or opposition of the issue? [required] **In opposition**



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

Kyle Hanson Riley Park LAP Comments.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

My name is Kyle Hanson and I live at 437 18A Street NW. I am fully supportive of the development and modernization of not just the Riley Park area, but also 19<sup>th</sup> Street NW specifically. The Riley Park Land Area Plan ("Riley Park LAP") has done a fantastic job of envisioning the future of this Calgary neighbourhood by outlining core values to be upheld throughout the development process and by targeting key areas for growth within those guidelines. However, there is one stretch of land – the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW – that the Riley Park LAP has classified in a way that is in direct conflict with its vision and core values. The purpose of my comments below is to explain why this unique block in West Hillhurst must be re-designated before the Riley LAP is finalized in order for 1) the vision and core values of the Riley Park LAP to be sufficiently met, 2) for community members (pedestrians in particular) to be safe, and 3) to avoid a waste of the council's & community's time and resources driven by applications for developments that are not a fit for this stretch of land.

### Proposal

The east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is currently designated as "Neighbourhood Connector" per Map 3: Urban Form and "Low-Modified (up to 4 Storeys)" per Map 4: Building Scale. **This block should be redesignated as "Neighbourhood Local" and "Limited (up to 3 Storeys)."**

### Reasoning

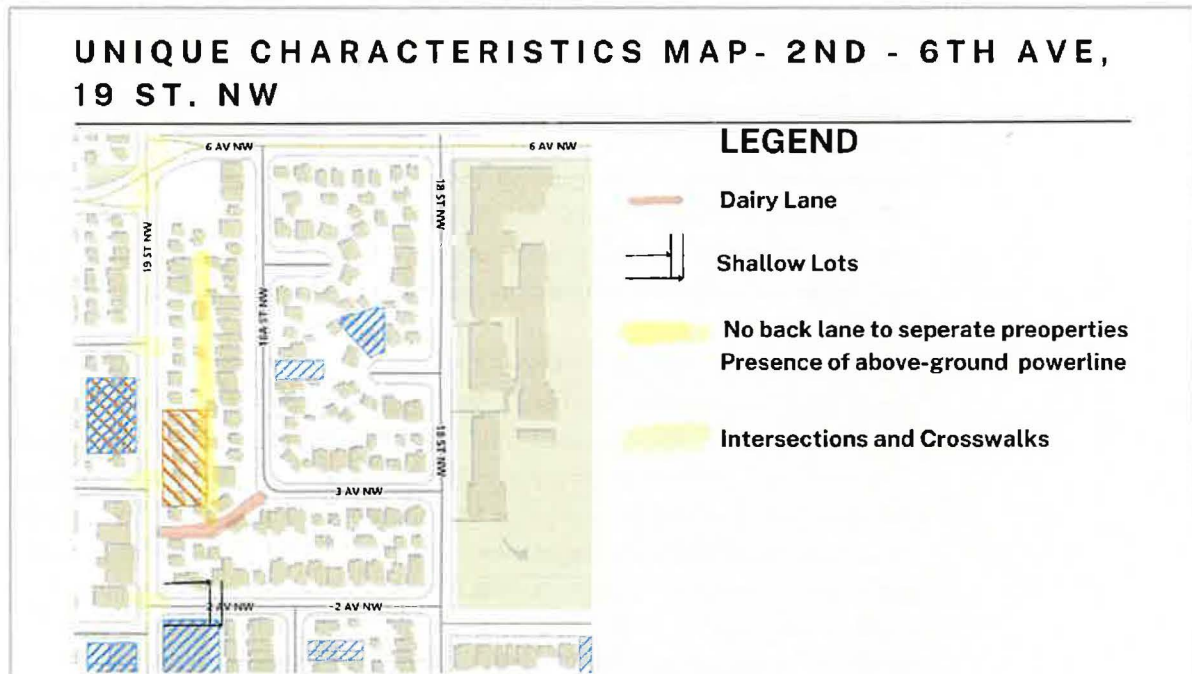
The east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is a very unique stretch of land in West Hillhurst because **it does not have a back lane**. The lack of a back lane in conjunction with well-established and highly utilized pedestrian and bike routes in this area (that the Riley Park LAP wants to expand and enhance) will create many logistical and safety issues if Neighbourhood Connector 4 Storey buildings are erected here. In fact, **the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is the only Neighbourhood Connector & Low-Modified land parcel on the Riley Park LAP (as outlined on Maps 3 & 4) that does not have a back lane**. The inclusion of this stretch of land may have even been an error in this LAP draft given how the council clearly sees how back lanes are paramount for Neighbourhood Connector & Low-Modified areas.

Key differences between these designations that would either create or prevent logistical, safety, and climate issues on this unique land parcel are:

- Neighbourhood Connector & Low-Modified buildings allow for grade-level commercial businesses, whereas Neighbourhood Local & Limited buildings do not. Per the LAP, these commercial businesses should be "designed to mitigate impacts on adjacent residential uses" (section 2.2.1.5.c). Commercial businesses located on a street with no back lane will create many safety & logistical issues for pedestrians, cyclists, and adjacent residences (see details below).
- Neighbourhood Connector areas should "mitigate impacts, such as noise and vehicle circulation, on adjacent residential uses" (section 2.2.1.5.e.ii), which will be impossible to achieve on a road that does not have a back lane.
- Neighbourhood Local & Limited buildings should "be designed to complement the surrounding context and consider the impacts of massing, lot coverage, and setbacks on the following: i.



Access to sunlight and shade on adjacent parcels; and ii. Protection of existing, healthy trees or landscaping on the parcel, where appropriate” (per 2.2.1.6.b). A Neighbourhood Local & Limited scale designation for this parcel of land with no back lane will allow developments to align with the Riley Park LAP’s climate resilience goals, whereas a Neighbourhood Connector & Low-Modified designation will be in direct conflict with those goals.



*Vision Elements & Core Values Put at Risk from No Back Lane with Current Land Designation*

1) “Safe and Accessible Communities”

- a. One of the Riley Park LAP’s key goals is to “ensure that safety and accessibility are key considerations in public space improvements, new building design, and in considering improved transportation options, especially around transit station areas.” A Neighbourhood Connector & Low-Modified designation on this land parcel with no back alley would not allow the community to achieve this goal.
- b. We must ensure the safety of children and the elderly, who are highly concentrated in this area from community mainstays like Queen Elizabeth School and General deLalanne Manor and who are connected by many crosswalks, bike lanes, and unique walkways like Dairy Lane.
- c. Lack of a back lane would force the following items to all be managed directly on 19<sup>th</sup> St NW, in the middle of pedestrian and cyclist pathways: 1) entering & exiting underground parkades, 2) collection of large commercial garbage dumpsters, and 3) high volume commercial & residential deliveries.
- d. These required logistics of Neighbourhood Connector 4 Storey buildings would increase vehicle traffic, particularly of large commercial garbage & delivery trucks, to cause the following pedestrian safety issues and therefore reduced foot traffic:



- i. Increased volume of commercial vehicle traffic crossing over the established **bike lane** on the east side of 19<sup>th</sup> St NW and large garbage dumpsters parked in the middle of the east-side 19<sup>th</sup> St bike lane as they wait to be collected will create clear obstacles and therefore safety issues for cyclists, which is at odds with Calgary's 5A Network goals.
  - ii. Higher volume of delivery vehicles and vehicles accessing required underground parkades for these buildings will need to cross over the highly frequented **sidewalk** on the east side of 19<sup>th</sup> St NW, putting pedestrian safety at risk. Pedestrians who utilize "**Dairy Lane**" (the walkway just north of 2<sup>nd</sup> Ave NW that connects 18A St NW and 19<sup>th</sup> St NW, which is a favourite of Queen Elizabeth students commuting to/from school), the three highly frequented **crosswalks** on 19<sup>th</sup> between 2<sup>nd</sup> Ave NW and 6<sup>th</sup> Ave NW, and the east 19<sup>th</sup> St sidewalk would become less visible to traffic from road blockades created by garbage dumpsters waiting for collection and temporarily parked delivery vehicles along the east side of 19<sup>th</sup> St.
  - iii. The designation of east 19<sup>th</sup> St NW as a Neighbourhood Connector area will create these pedestrian safety issues, leaving community members no option but to avoid increasing their foot traffic on 19<sup>th</sup> St. This is starkly at odds with the Riley Park LAP's pedestrian-focused goal for the future of 19<sup>th</sup> St NW. If however this stretch of land was designated as Neighbourhood Local with a Limited scale, these safety issues would disappear because there would be no buildings with grade-level commercial businesses that would require 1) an underground parkade with a 19<sup>th</sup> St entrance/exit, 2) commercial-sized garbage dumpsters that must be collected on 19<sup>th</sup> St, and 3) a large increase in frequency of deliveries from commercial vehicles.
- 2) "Moving to and Through the Riley Communities" – the pedestrian experience would not be enhanced and in fact, pedestrian traffic would decline along 19<sup>th</sup> St NW if buildings with grade-level commercial businesses under a Neighbourhood Connector & Low-Modified designation do not have access to a back lane.
  - a. The Riley LAP states that multi-unit residential/commercial developments should provide access to off-street parking and loading areas from the lane. The only way to provide off-street parking for these commercial buildings would be to create **underground parkades** with access directly on 19<sup>th</sup> St NW, and it would be impossible to create loading areas from a lane because there is no back lane. The existing commercial developments on 19th Street (to the south and the west) all have access to a back lane where their entrances/exits to underground parkades exist, which allows for these developments to be aligned with this mobility goal. The lack of a back lane on this specific land parcel, if designated as a Neighbourhood Connector, will cause 1) an increase in vehicle traffic needing to enter/exit these underground parkades directly on 19<sup>th</sup> St, and 2) loading areas to be built directly on 19<sup>th</sup> St NW, forcing large vehicles to cross over the existing bike lane and sidewalk, which will disrupt the pedestrian experience and create safety issues.
  - b. **Garbage collection** for Neighbourhood Connector buildings with grade-level commercial businesses will also create issues on a street with no back lane. The only logistical

solution to garbage collection from businesses would be to have large commercial garbage dumpsters wait to be collected directly on 19<sup>th</sup> St, which will act as vehicle, cyclist, and pedestrian blockades. This is directly at odds with the Riley Park LAP pedestrian experience goal. If this land parcel was designated as Neighbourhood Local and Limited Scale, then there would be no need for businesses to have garbage collected in large dumpsters on the street, allowing for the LAP's pedestrian goal to be met. Additionally, how would waste from certain operations (i.e. grease traps) be collected without a back lane? Without a back lane, would commercial venting be pointed out the back of the building into neighbours' backyards on 18A St?

- c. An increase in **commercial & residential deliveries** directly on 19<sup>th</sup> St would also occur on this land parcel if designated as Neighbourhood Connector since there is no back lane. Delivery trucks would be forced to block vehicle, cyclist, and pedestrian traffic while temporarily parked on 19<sup>th</sup> St as they make their deliveries.
- d. Designating this area as Neighbourhood Local and Limited Scale would allow pedestrians to continue to move freely & safely by 1) removing the need for underground parkades, 2) keeping 19<sup>th</sup> St garbage collection plans unchanged (i.e. small residential garbage cans will continue to be collected on 19<sup>th</sup> rather than large commercial dumpsters), and 3) keep 19<sup>th</sup> St deliveries to lower volume residential needs rather than larger commercial deliveries. And additionally, there would still be the opportunity for developers to create more volume of and therefore affordable home options on this land parcel.

### 3) "Climate Resilience"

- a. Another key goal of the Riley Park LAP is to "improve energy use, reduce greenhouse gas emissions, and better adapt to climate-related hazards in buildings through a range of initiatives such as building design, increasing the urban tree canopy, and creating more complete communities."
- b. Many neighbours along 18A St NW (who share a backyard with the section of 19<sup>th</sup> St NW at hand) have participated in Canada's Federal and Calgary's city solar panel programming, some paying up to \$25,000 to install solar panels on their homes. Allowing 4 storey buildings to be erected directly next to these solar panelled homes without the buffer of a back lane would render the hefty investments that the city and community members have already made inoperable from a large increase in shadowing, which would likely require the city to pay back 18A neighbours for their now obsolete investments.
- c. 4 storey Neighbourhood Connector buildings built on a street with no back lane would require underground parking, and these underground parkades would put the root system of existing trees along 19<sup>th</sup> St and 18A St at risk. New trees installed alongside these larger buildings with no back lane would also compound the shadowing issue, blocking existing solar panels further, not to mention be in direct conflict with section 2.2.1.4.c.iii, which states that Neighbourhood Connector areas should consider shadowing impacts on neighbouring properties.

### 4) Comments around the Riley Park LAP section 2.5.6.1

- a. I am arguing against section 2.5.6.1.B for this unique stretch of land which states that "Developments are encouraged to share mutual driveway accesses." It is my understanding that this principle came about after a review from the mobility team,

which said that we should avoid more driveway entrances along the east side of 19<sup>th</sup> St between 2<sup>nd</sup> and 6<sup>th</sup> Aves because they would create more dips in the ground for pedestrians. It is clear to me that the mobility team was not made aware of the alternative to additional dips in the sidewalk, which is all the items I listed above: more large commercial vehicles & garbage dumpsters crossing over bike lanes and sidewalks right by Dairy Lane and 3 key crosswalks in the neighbourhood. I am arguing that way more pedestrian safety risk would arise from the latter option because of a Neighbourhood Connector/4 storey designation than from having a few more dips in sidewalks, which are 5A friendly, that would come with a Neighbourhood Local/3 storey designation.

- b. 2.5.6.1.C says there should not be any newly built single-detached, semi-detached, and duplex housing forms “with front garages.” It would be impossible to build any sort of housing form without a front garage along the east side of 19<sup>th</sup> St NW between 2<sup>nd</sup> and 6<sup>th</sup> Aves, and I am arguing that there is more pedestrian safety risk from having fewer front garage entrances from 4-storey commercial buildings than from having more driveway entrances without the commercial vehicle risk.
- c. 2.5.6.1.D says that developments that share a property line with single-detached, semi-detached, and duplex housing forms “should step back the building above the third storey along the shared property line.” The depth of the lots on the east side of 19<sup>th</sup> St between 2<sup>nd</sup> and 6<sup>th</sup> Aves is **too shallow** to accommodate this sort of a ruling – i.e. there is not enough lot depth to allow for the creation of a 4<sup>th</sup> storey with this setback rule. So given all of the concerns we have, the max allowable building height on this block should be 3 storeys.
- d. 2.5.6.1.F says that developments along 19<sup>th</sup> St NW should exceed tree requirements to help expand the tree canopy of this area. As explained above, the current designation of this stretch of land as Neighbourhood Connector with Low-Modified 4-storey height will not allow this to occur.

#### *Examples of Problematic & Denied Proposed Land Use Redesignations and Developments in this Area*

There is already precedent set by this council that buildings that fall under the Neighbourhood Connector and Low-Modified Scale (i.e. MU-1 & similar) would not function and therefore are not allowable on the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW. If the Riley Park LAP does not change the designation of this stretch of land from Neighbourhood Connector & Low-Modified Scale to Neighbourhood Local & Limited Scale, then developers will continue to apply for land re-designations such as MU-1, which community members will continue to vehemently oppose for all the reasons laid out in this commentary, unnecessarily draining the council’s time and resources.

The aforementioned precedent was set by application LOC2021-0080. The proposed development on this originally R-CG parcel was initially an application for MU-1 but was swiftly declined by the City given the unique characteristics of this stretch of 18A. Ultimately, the M-CG zoning was approved by the city but refused by the SDAB because of density and privacy concerns and the plethora of relaxations related to unique lot restrictions (LOC 2021-0080, DP2023-08098, SDAB2024-0027).

There is now a new application for land re-designation from R-CG to MU-1 on the east side of 19<sup>th</sup> St NW that does not have a back lane (application LOC2024-0297), which the community strongly opposes for all the reasons (and more) outlined in this commentary. If the Riley Park LAP changes its designation of the east side of 19<sup>th</sup> St NW from Neighbourhood Connector & Low-Modified Scale to Neighbourhood Local to Limited Scale, developers would be prevented from wasting our council members' and community members' time and resources by submitting applications for zonings & buildings that do not 1) make logistical sense for this unique block in West Hillhurst and 2) do not align with the Riley Park LAP's vision & core values. Instead, developers would have a clear roadmap for what buildings they should be proposing for this block that increases housing density in a safe and effective way that is in line with the vision and core values of the Riley Park LAP.

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] **Jessica**

Last name [required] **Dillabough**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Riley Park LAP**

Are you in favour or opposition of the issue? [required] **In opposition**

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The proposed development is planned to have 60 units. Our concerns are related to how garbage / recycling for residents will be collected and how parking for 60 new families will be accommodated. 19th street is already a very busy road with vehicles traveling at excessive speeds, and exiting driveways onto the street is difficult and dangerous with the homes there today. Given the Riley Park Development Plan is not yet approved, we feel this development should be delayed until after approval to ensure it is aligned with the approved plan.

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First name [required] Deborah

Last name [required] Gomm

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters RILEY LOCAL AREA PLAN PROPOSAL

Are you in favour or opposition of the issue? [required] In opposition





ATTACHMENT\_01\_FILENAME

OPPOSITION TO RILEY COMMUNITY PLAN 202502.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

February 16, 2025

To: City of Calgary & Mayor Gondek

From: Deborah Gomm [REDACTED]

1316 21A St NW

**RE: OPPOSITION TO THE RILEY LAP AND MULTI UNIT BUILDINGS**

I am writing to express my opposition to the Dec 2024, new and revised Riley LAP - specifically oppose the changes and increase in multi-story and multi-dwelling units in the community from the earlier Riley LAP without consultation.

We ask for a return to the Riley LAP draft presented to council in October.

Like the majority of Calgary homeowners, we are shocked and dismayed with the deterioration of our communities due to the volume of high density, poorly built housing going up at a rapid rate due to the RC-G housing changes. This H-GO designation is a horror to communities and to the city as a whole.

With no setbacks, long tunnel-like passage ways, low level suites, and no parking - we are seeing the degradation of our city. These will become the slumlike buildings of the future.

Where is the strategic vision for ensuring green space, setbacks, no shadowing, ample parking and more? Where is the planning to ensure the Calgary of 20 years from now has appeal, trees, room for families to play and grow?

The density proposed - and the manner in which it is allowed - will only ensure that Calgary becomes an ugly metropolis, with zero charm, run down crowded enclaves with dark dwellings, families living on top of each other.

**Why are you not learning from the mistakes of other cities?**

<https://denverite.com/2018/05/07/denver-slot-home-replacements/>

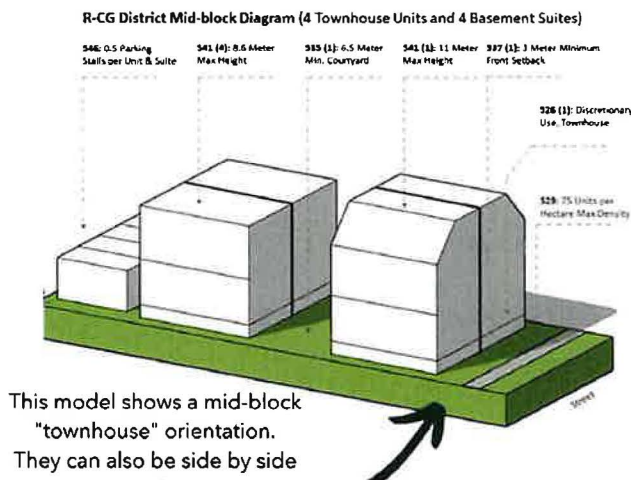
<https://www.denverpost.com/2018/05/06/denver-slot-home-crackdown/>

<https://www.planetizen.com/news/2018/05/98612-denver-bans-slot-homes-not-they-changed-neighbourhoods>

### ***Denver Bans 'Slot Homes,' But Not Before They Changed Neighborhoods (2018)***

*As in several other older neighborhoods in Denver, the landscape is now dominated by hundreds of "slot" homes, which feature sideways-facing townhomes stacked horizontally to the alley.*

These "slot homes" now dominate in Calgary - yes they maximize profit for the developer - but they have no setbacks, no green space as the property is fully built out on every square inch, and only a tunnel between structures. There is no quality of life for residents of such dwellings. Perhaps for short term rentals by institutional buyers. But there is NO enhancement to the City or community.



Now one is proposed in Briar Hill. A slot style multi-multi family structure. This must stop.

Denver has it right - any multifamily should have entrance ways to the street ONLY. Not via back alleys, or "slots".

**Further to that, the City has once again proceeded to make radical changes to our Local Area Plan -**

1. A SIX story structure on 12 Ave just adjacent to the school and a very popular park, playground and green space - SIX stories! In the middle of a community?
2. FOUR story structures all along 14 Ave - this is NOT a throughway. 14 Ave is a dead end street - a quiet community street on which bicycles and pedestrians use heavily.

These multi storey structures sadly will have no setbacks or allowance for trees and green space, resulting in noise, parking and traffic (a big consideration for all the children walking to school from north of 16 Ave to Briar Hill Elementary).

What we see is a major - significant - change from the May 2024 plan to the December 2024 plan which seems arbitrary and without any consideration to the MDP and TOD guidelines.

As you well know, the MDP guidelines says it will “*ensure infill development **complements the established character** of the area and does not **create dramatic contrasts**”.*

**The Local Area Plan for Briar Hill clearly does not respect these guidelines established by the City.**

*We must insist on a return to the Riley Draft LAP plans presented to council last October - which has less apartments and condos.*

*To have no “slot housing” with two rows of multi family mid block or corner block*

*To maintain indoor access between residential towers and shopping at North Hill Centre*

*To ensure, where two dwellings replace one, well-designed semi detached forms are used that blend with the proportions of the surrounding homes.*

It is time to begin to LISTEN to the communities instead of forcing unacceptable changes upon us. Work WITH us for change.

Respectfully,

Deborah Gomm

1316 21A Street NW

[REDACTED]

[REDACTED]

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First name [required] Amy

Last name [required] Atkinson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Park LAP

Are you in favour or opposition of the issue? [required] Neither

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

In consideration of the redevelopment of 19th Street as part of the Riley Park LAP, the plan should be revised to reflect the specific physical characteristics of the 400 and 500 blocks of 19th Street NW. These blocks lack alleyways and have shallower lot depths than other areas, which limits their capacity to accommodate large-scale four-storey developments without significant site access and compatibility challenges.

To ensure appropriate scale and integration within the existing urban fabric, the plan should establish clear guidelines, such as height and density limitations, for future developments on these blocks. This will provide clarity to developers and ensure that new projects align with the constraints of the site.



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First name [required] **Nancy**

Last name [required] **Boa**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Riley Local Area Plan**

Are you in favour or opposition of the issue? [required] **In favour**



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I have lived in Hounsfield Heights for 34 years and I strongly support the recommendations in the final draft of the Riley Local Area Plan. HH/BH is a wonderful community that really needs far more diversity in housing choice as we have the infrastructure to support people and families throughout their lives. Please support the Riley Local Area Plan.

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First name [required]

Brian

Last name [required]

Luterbach

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Standing Policy Committee on Infrastructure and Planning

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Hounsfield Heights - Briar Hill Residents - Riley Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I do not support the Riley Local Area Plan the HH-BH Area Redevelopment Plan (ARP) should remain to guide development in this area. The change to 6, 4, and 3 story buildings is inappropriate. The behavior of the council to force a decision over the views of the residents is even worse than your plan. Should this go ahead I will not vote for any incumbent city council members in the next election.

## FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

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Please note that your name and comments will be made publicly available in the Council or Council Committee agenda and minutes. Your e-mail address will not be included in the public record.

## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] **Norman**

Last name [required] **Hopkins**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Item 7.3.2: Riley Communities Local Area Plan**

Are you in favour or opposition of the issue? [required] **In opposition**



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

My wife and I have owned and lived in Briar Hill since 1987 and have owned and resided in two homes since that time. The first home was at 1604 22nd ST NW (1987-2001) and the second and current home at 1519 21 St NW (2001-present). We bought in the area for a variety of reason's not the least of which was the R-1 zoning at the time. With the R-1 zoning we thought that the neighborhood would be relatively quiet and safe for us to raise a family. We raised our family of two children here and it was, for the most part, quiet and safe. At the time we didn't anticipate the dramatic changes being proposed for the neighborhood under the proposed new LAP. The proposed changes along our block and for the blocks north of 14th Avenue and east of 21A street, including 4-6 story buildings will dramatically change the nature of the community with increased traffic, noise and demands on the infrastructure. All of this runs completely counter to the reason's we made Briar Hill a home for 37 years. Had we seen these types of changes coming I'm not sure we would have stayed. The proposed LAP completely disrespects the long time owners and residents of the area such as ourselves. We would like to see a return to the original LAP draft presented to council last October.

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First name [required]

Cole

Last name [required]

Richardson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Riley Communities LAP

Are you in favour or opposition of the issue? [required]

In favour



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

Riley Communities LAP Support Letter - Bankside Properties.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)



February 26, 2025



The Mayor and City Council

**Subject: Riley Communities Local Area Plan**

Dear Mayor and Council,

I am writing on behalf of Bankside Properties and Sumus Property Group to express our support for the revised Riley Communities Local Area Plan that will be heard at the March 4<sup>th</sup>, 2025, Council Meeting.

The former Grace Hospital site presents a wonderful opportunity for urban regeneration, and we aspire to create a vibrant neighbourhood village with a variety of housing options, community focused amenities, and a robust retail offering. The future development will function as a cornerstone of connectivity for the surrounding communities, as well as SAIT and AUArts. Meandering channels with pocket terraces will connect the SAIT / AUArts/ Jubilee LRT Station to Kensington Village and provide surrounding areas with a place for people to gather, recreate, and share community amenities.

Bankside is supportive of the proposed LAP because we believe the plan establishes a framework that encourages development and density in the areas that have abundant public infrastructure elements such as parks and high-speed transit. Bankside is particularly supportive of the revisions made to the LAP following the Council recommendation to refer the Plan back to Administration and the recommended revisions including the following:

- The inclusion of the SAIT / AUArts / Jubilee LRT Station Area as a third station area and the modification to building scales within this portion of the Plan Area.
- The addition of policy 2.2.4.b that reads *"should a new concept emerge for a Comprehensive Planning Site resulting from a submitted master plan, amendments to the Plan including Map 3: Urban Form and Map 4: Building Scale, should be made."*

We suggest that these proposed changes provide policy guidance to allow for the Riley Park Village site to be developed in a transit adjacent appropriate manner informed by a comprehensive masterplan that our development team initialize in the coming weeks.

Bankside looks forward to developing the Riley Park Village site and encourages Council to support the Riley Communities LAP.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cole Richardson".

Cole Richardson  
Managing Principal

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First name [required] Brenda

Last name [required] Domeij

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters 7.3.2 Riley Communities Local Area Plan Referral IP2025-0009

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

Riley LAP Concerns (1).pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

To Members of the Calgary City Council:

I do not support the 2024 Building Scale or Urban Form proposed in December for the Riley Local Area Plan specifically for the Hounsfield Heights - Briar Hill Community for the following reasons:

1. The community has one very significant pinch point that needs to be seriously understood and considered for any density proposals - this is the above ground LRT crossing on 14th Avenue coming from / going to the Lions Park Station. At the current levels of density especially during rush hour, traffic is backed up and bottle necked at this corner. Pedestrians too are also impacted.
2. Increased density will necessitate the increase of the number of trains available to service the anticipated increase in ridership. Even now, at the current level of population, at peak times on cold days and during Stampede, trains get too packed before they arrive at the Lions Park Station leaving riders waiting for the next train. The impact on 7th Avenue SW with increased trains will be significant. Can it handle it? Increased trains will further impact traffic on 19th Street NW and 14th Avenue NW worsening the back-ups and bottle necks.
3. Increased density will without question increase the number of cars in the vicinity further compounding the demand on the traffic flows as outlined above.
4. Increased number of waste bins will increase the numbers of trucks that will also compound the demand on traffic flow.
5. Increased number of firetrucks and ambulances will be required to support the density increase. Again traffic flows will impact timely arrival.
6. Additionally current new builds lack any architectural control. Newly developed neighbourhoods have these controls while supporting the required density. Older neighbourhoods too were originally planned with architectural consistency and a level of aesthetics. With multiple developers, and no architectural controls, there is no aesthetics and the current neighbourhood character is being lost.

All of the above will happen with any increase in density. However, the latest proposal will by far exacerbate the problems. I urge you to at the very least revert back to the May 2024 Building Scale. I also strongly urge you to allow each LAP community input to provide acceptable community architectural controls. Visit the Banff Trail Community to see what no architectural control looks like. It isn't pretty.

Your serious consideration for my concerns and suggestions is most appreciated.

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] **Ian**

Last name [required] **Thom**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Riley Communities LAP IP2025-0009**

Are you in favour or opposition of the issue? [required] **In opposition**





ATTACHMENT\_01\_FILENAME

Comments Riley LAP IT 25.02.27.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

## **Riley Communities Local Area Plan**

This planning process has been anti-democratic and unilaterally imposed upon our community with little to no face to face consultation with the residents or their representatives in the Community Association. The City and its Administration need to provide a diary of their consultations with the community.

Many aspects of the imposed plan take no consideration of MDP or TOD guidelines. There are no assessments of the potential impact that the plan will have on transit and traffic. Studies on these need to be prepared and made available before any approvals can be considered.

It is revealing that the Calgary Plan, which should provide guidance and consistency to all Local Area Plans, has been delayed until some time in 2026. The current patchwork being cobbled together without significant community engagement or adherence to present city guidelines, is a classic cart before the horse approach.

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First name [required] Yvonne

Last name [required] Benson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters 7.3.2 Riley Communities Local Area Plan Referral, IP2025-0009

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I have always loved the area due to the significant green space, large trees, sunlight and family orientated homes within the community.

I had always dreamed to move back to the neighborhood, and I was excited to be able to have an opportunity to purchase my late mother's home and in the future once I saved up to perhaps explore renovations to create my dream home on a property that is very dear to myself and extended family.

My hopes and dreams were dashed once I learned about the proposal for the Riley local area plan as it significantly changes the dynamics and landscape of our quiet and safe community that is currently primarily single detached properties.

The current nature of the zoning promotes long-term commitment and ownership to the properties fostering a real sense of community and opportunities to get to know your neighbours over long period of time.

I have recently learned about the Riley local area plan, and I have substantial concerns with what has been proposed with lack of community engagement.

From what I understand there was limited amount of time to engage the public in getting feedback from the community prior to the final approval that will be presented to council on March 4th, 2025.

I just recently heard about the Riley local area plan from a leaflet that was distributed in the mailbox by the Hounsfield Heights Briarhill Community Association.

Reading about these proposed changes that are in the final stages sank my heart. I understand that as a city and a community we must come together to think outside the box to create affordable housing for our community to thrive as individuals and as a whole.

However it is paramount that changes in our communities are done in a way that is inclusive, sustainable and respectful for all parties. Mindfulness for those that already have invested personal interest in the existing community and have put down strong roots must be top of mind in planning for the future growth of our city. Respecting past community commitments, honouring the past and moving forward to grow our city's capacity in ways that bring us together not creating a divide is key from my perspective to cultivate healthy individuals and communities.

I see a number of unsettling consequences for our neighborhood if the new proposal of the Riley local area plan goes through such as:

Increased traffic, noise along with other infrastructure challenges in the community upsetting the current peaceful neighbour

---

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

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First name [required]

Terri

Last name [required]

MacLeod

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Standing Policy Committee on Community Development

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Riley LAP

Are you in favour or opposition of the issue? [required]

In opposition



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

We are concerned for the development that it has not taken into consideration of the kreosote concern. There is no reference or guidance on how they are going to manage the health risk related to developing on a know kreosote contaminated area. There is a park behind it where many children play. It is a health risk to all in the area. There does not seem to be any policy or guideline in place to support handling in an appropriate way to mitigate any of that risk. This is not acceptable. Until that is safely mitigated there should be no approval to move forward. Thank you.

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First name [required] **Helen**

Last name [required] **Beach**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Standing Policy Committee on Community Development**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Riley Local Area Plan, Hounsfield Heights - Briar Hill densification**

Are you in favour or opposition of the issue? [required] **In opposition**



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

HHBH Community development 2025.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

**Please refer to my email sent to public submissions, as well as the Word document included within this submission.**

HHBH neighbourhood issues  
2025.02.26

As a member of the Hounsfield Heights – Briar Hill Community (HH-BH), I am writing with regards to the substantial impact of the new Riley Local Area Plan process.

This letter is in addition to the one from our own HH-BH Community Association's letter. (link below) We support what has been written by our Director of Land Use, Beth Atkinson.

The Phase 4 Riley proposal contains many items that conflict with existing homes in the community. While understanding the need for densification near C-Train stations, this new proposal has ramifications that are unacceptable.

**Traffic impact:**

- What is the traffic impact assessment?
- When will you give us the traffic impact proposal? Significantly, the transformational change in our neighbourhood will impact change regarding how we treat our community. Surely there needs to be forethought regarding traffic in and out of our community. We need a streetscape to show how proposed developments will flow with traffic and accessibility.

**Transit impact:**

- Securing transit infrastructure ahead of proposed influx of travellers must come first.
- Currently the C-Train at the Banff Trail station has been difficult to gain access to ride into the downtown core during major working hours for at least a decade.
- Not everyone works downtown.
- Our current transit infrastructure is underwhelming to accommodate the number of people anticipated to use the C-Train and/or bus especially when one needs to work in a location other than the downtown core. And, as stated, the C-Train cannot accommodate the numbers of people who are anticipated to travel this way.
- Mayor Gondek and city council have a concept of the European cities where people can access much by foot and by local transit. Calgary does not have practical solutions to this problem in that:
  - Our weather is often unsuitable for walking or cycling during many of the coldest months; weather factors are obviously ignored.

**Parking impact:**

On private property - single homes versus multi-dwelling proposals:

- Understanding the need for more densification, what is currently being proposed is far from realising the practical issues such as infrastructure, traffic and parking problems.

- It appears that city council envisions foot and cycle traffic versus cars. Obviously, this is neglecting the reality of the increase in size of the densification of HH-BH communities.

- Again, where is the plan for traffic impact?

- To place 12, 6, and 4 storeys within such a small area will impact everything from light, traffic, neighbourhood engagement, parking from owners which will also include their friends and family who may drive to visit.

#### **Human connection and “sense of space”:**

- What are the plans for respect for green space? Where is our “sense of space?”

- Lost will be the back yard home garden where many grow food.

- Many of us have spent years and finances developing our yards for pleasure and visible artistry. Considering many have invested in their homes for retirement years, is this an appropriate and considerate impact for those who wish to age in place?

- Much preferred would be semi-detached built forms that can be designed to blend in with existing homes while still adding density.

#### **Housing developers:**

- Is it legal to put a 12-unit development “townhouse” in the middle of a block of single-family homes?

- Is it legal or ethical to allow the frontage setback to become less than the existing homes on the street?

- This is forced density. Suburbs were planned for a mixture of housing builds. Ours are forced.

- The city is *not* listening to our community nor is there accountability for their actions.

- What about mobility? This has yet to be addressed.

- There was no public engagement on the new expansion of the proximity to the C-Train line. This makes a mockery of our engagement back in May 2024 Building Scale.

- What are the plans for water, garbage, fire and ambulance accessibility, and for parking? There is a fundamental disconnect between the city and the communities that will be affected.

I look forward to your reply and to hearing some consideration regarding the undemocratic mandate which appears to disregard basic electorate on the issues of forced zoning in our city.



Helen Beach  
2212 Juniper Road NW  
Calgary, AB  
T2N 3V2



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First name [required] Laura-Marie

Last name [required] Berg

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters 7.3.2 - Current Riley Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

2025-02-27 LBerg and J Lacroix Submission re Riley LAP.pdf

ATTACHMENT\_02\_FILENAME

Appendix A 2025-01-09 Screenshot of City Hearing Schedule.pdf

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

February 27, 2025

Laura-Marie Berg and  
Jean Lacroix  
1607-21A St. NW  
Calgary, Alberta  
T2N 2M7

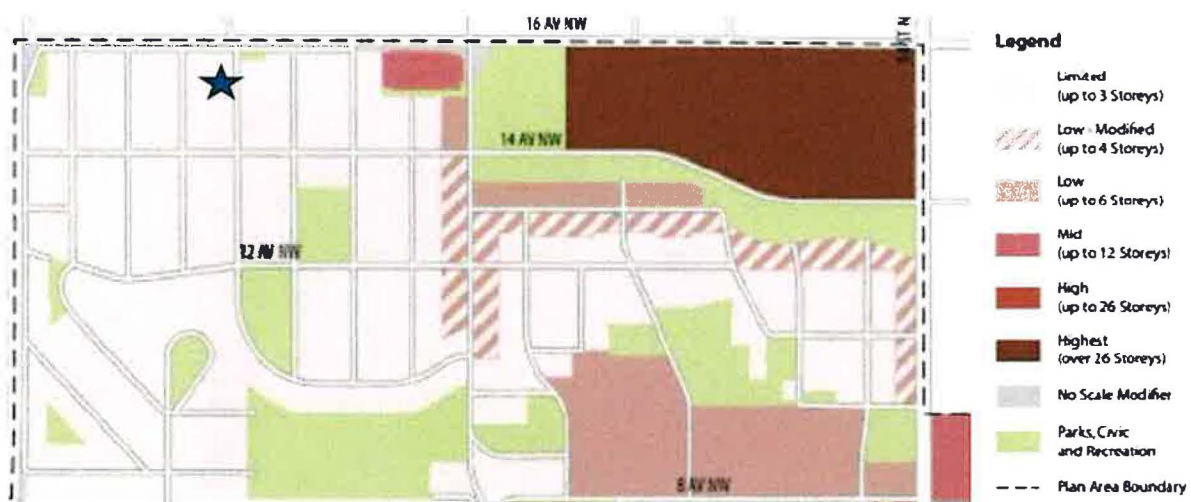
The City of Calgary Mayor and  
Councillors for Wards 1 to 14,

Via Email – [themayor@calgary.ca](mailto:themayor@calgary.ca), [ward07@calgary.ca](mailto:ward07@calgary.ca), [ward01@calgary.ca](mailto:ward01@calgary.ca), [ward02@calgary.ca](mailto:ward02@calgary.ca),  
[ward03@calgary.ca](mailto:ward03@calgary.ca), [ward04@calgary.ca](mailto:ward04@calgary.ca), [ward05@calgary.ca](mailto:ward05@calgary.ca), [ward06@calgary.ca](mailto:ward06@calgary.ca),  
[ward08@calgary.ca](mailto:ward08@calgary.ca), [ward09@calgary.ca](mailto:ward09@calgary.ca), [ward10@calgary.ca](mailto:ward10@calgary.ca), [ward11@calgary.ca](mailto:ward11@calgary.ca),  
[ward12@calgary.ca](mailto:ward12@calgary.ca), [ward13@calgary.ca](mailto:ward13@calgary.ca), [ward14@calgary.ca](mailto:ward14@calgary.ca)

**Re: City of Calgary Council Hearing – March 4, 2024 – Riley Local Area Plan**

I am writing on behalf of my husband and I to request that City Council reject the proposed Riley Local Area Plan (“**Current Riley LAP**”) that was put forward by City administration and revert to the plan that was presented to City Council on October 16, 2024, and distributed to the local communities in May, 2024 (the “**May 2024 Riley LAP**”). We understand that our local Community Association has put forward a similar proposal, with two other suggested amendments to address the concerns of elderly and disabled people in the Renaissance Building, and that new duplexes be built so they are adjoined to better fit into the existing community. We support these two additional amendments being incorporated.

The May 2024 Riley LAP was the result of over two years of community consultation and is set out in the map below. The location of our home is denoted by a blue star. In this submission, we will refer to the area north of 14<sup>th</sup> Avenue NW (and west of 19 Street NW) as “**North Briar Hill**”.



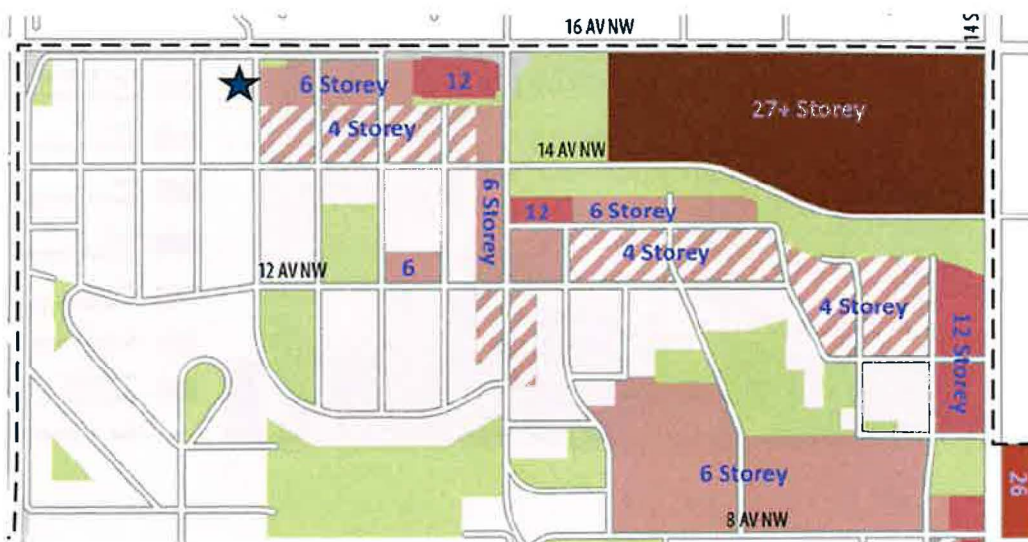


The May 2024 Riley LAP allowed developments up to three storeys in our immediate area of North Briar Hill. We were not concerned about those proposed changes because we are in favour of balanced density increases in our vicinity. We understood that as our part of the community in North Briar Hill is redeveloped, the three storey dwellings might consist of duplexes with secondary suites, and some row housing.

At the Council meeting on October 16, 2024, however, we understand that City administration was instructed to revise the May 2024 Riley LAP to further increase density, notwithstanding the extensive consultation that had occurred, and the fact that City administration believed that the May 2024 Riley LAP represented a balanced approach. City administration was provided until the end of the first quarter of 2025 to present a new proposal to the Infrastructure and Planning Committee (“IPC”), which could have allowed for further community engagement regarding suggested revisions. Instead the Current Riley LAP was drafted in less than two months, more than four months ahead of the deadline, with no further consultation with local residents. There were notification sessions, however these were scheduled immediately prior to Christmas between December 10 and 18, with only two online sessions offered in the evenings.

The invitations for these notification sessions did not give any indication of the massive changes that were made to the May 2024 Riley LAP, and had no link to maps which would illustrate the changes. Because the notification sessions occurred largely during the workdays, and were immediately prior to Christmas, we were not able to attend due to other commitments. We also assumed (incorrectly) that after two years of consultation, any further changes to the May 2024 Riley LAP would be relatively minor.

On January 4, 2025, after seeing a draft article for a community newsletter, we were shocked to learn that the Current Riley LAP incorporated drastic increases in both the density and the extent of our community that will be affected by this density. We now face the prospect of having six storey apartment buildings directly across the street from us. Below is a map of the Current Riley LAP, again with the location of our home denoted by a blue star.



We learned from our community association that the IPC meeting to consider these changes was being held on January 8, 2025. It is important to note that we needed to learn this from our community association, because no agenda was posted for the January 8, 2025 IPC meeting, and the City of Calgary website noted that the IPC meeting was to occur on Wednesday, January 10 (a screenshot taken on January 9 of the City of Calgary website is attached at **Appendix A** to this submission).

We wrote directly to the mayor and all councillors regarding this issue, because by the time we learned the extent of changes in the Current Riley LAP, the deadline for submitting documents for the January 8, 2025 IPC meeting had already passed.

We were not the only members of the community who were completely unaware of what had transpired in December. On January 7, 2025, I knocked on 60 doors north of 14<sup>th</sup> Avenue, between 20A Street and 22<sup>nd</sup> Street, where four storey and six storey buildings are proposed in the Current Riley LAP. About a third (over 20) people answered their doors, and only one person (who had also seen the draft community newsletter article) was aware of the massive changes that had recently been proposed in North Briar Hill.

We have two key concerns regarding the Current Riley LAP – the huge contrast between four and six storey buildings across the street from bungalows, and the complete lack of consultation and very poor notification for this massive proposed change to North Briar Hill.

### **Contrast Between Bungalows and Six Storey Buildings**

Beginning with the first concern, the north side of 14<sup>th</sup> Avenue in Briar Hill consists largely of renovated and well-kept bungalows. A recent picture of our bungalow (brown house with red door) is set out below. The picture to the right is our view across the street, where the Current Riley LAP contemplates apartment buildings up to six stories high.



Our home (west side of 21A)



Planned area for 6 storey buildings across street

We intend to continue to live in our home through retirement – another 20 to 30 years. Our next-door neighbours have a young family and purchased their bungalow with the intent that it be their forever home. The young couple living next to our neighbours purchased their bungalow a few years



ago, also with the intent of living there long-term. Some of the bungalows in Briar Hill (particularly south of 14<sup>th</sup> Avenue) have been torn down, with large estate homes built in their place. It has been more common in North Briar Hill to see young families buying these more affordable bungalows and fixing them up to live there long-term. It must also be noted that in these bungalows the mature tree canopy is also maintained.

We emphasize again that we are not against increased density in our area and, with the recent changes to zoning, we expect bungalows to be replaced with multifamily structures up to three storeys – we welcome such a change. But the contrast between bungalows and a six-storey building across the street is too much. Even the City's own documents recognize that such sudden contrast is inappropriate, as noted below.

### **Municipal Development Plan**

"Intensification should be accommodated within existing communities in a sensitive manner." (sec. 2.2.5)

"Respect the existing character of low-density residential areas...Ensure an appropriate transition of development intensity, uses and built form between areas of higher and lower intensity...Ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern" (sec. 2.3.2)

"Recognize the predominantly low-density residential nature of Developed Residential Areas and support retention of housing stock, or moderate intensification in a form and nature that respects the scale and character of the neighbourhood." (sec.3.5.1)

"Buildings should maximize front door access to the street." (sec. 3.5.2)

### **TOD Guidelines and Implementation Strategy**

"TOD Guidelines – Work with local communities. Built form should complement the local context"

"These TOD Policy Guidelines will respect existing stable communities."

"Ensure that building massing and shadowing impacts are minimized."

"Sensitive interface adjacent to existing residential."

### **Guide for Local Area Planning**

"A local area plan supports communities experiencing redevelopment by outlining... a future land use concept for where and how new development can be integrated into the neighbourhood over time in a way that respects and enhances the existing context of the area."

"At all scales, redevelopment should consider existing context, parcel layout, building massing, and landscaping to sensitively integrate in the community."

"Retain existing healthy public (and private) trees and landscaping on, or adjacent to, development sites."

## **Lack of Consultation**

I was attentive to the two years of consultation that occurred with the May 2024 Riley LAP up until its presentation to City Council in October 2024. While I reviewed maps and was aware of concerns raised elsewhere in my community, until seeing the draft newsletter on January 4, 2025, I did not see anything in my immediate local area that concerned me. In fact, I was in favour of the gradually increased density that would come with the redevelopment of the North Briar Hill area.

When it comes to consultation, I am of the view that it is the people who are most affected by developments who should be consulted and heard. While I empathized with concerns raised elsewhere in the Briar Hill and Hounsfield Heights community, I did not feel it was my place to speak on behalf of others who would be affected by proposed developments in their immediate areas.

In short, when City administration reviewed the public comments they heard over the past two years in their technical review following the October 16, 2024 referral, they would not have seen any comments from me, and I very much doubt that they would have seen many comments from others in North Briar Hill. That is because prior to the Current Riley LAP, we were not directly and adversely affected.

Consultation matters – and I cannot say it better than our Court of Appeal did in *Thomas v. Edmonton (City)*, 2016 ABCA 57 (at para 40):

(The Court's) conclusion is also supported in light of the compelling public policy justifications for community consultation. Community consultations exist for a reason. Process matters. Why? Because a fair process is the basis for public confidence in the legitimacy of all democratic processes, including those related to the planning and development of land.

While *Thomas* was a case involving the Edmonton Subdivision Appeal Board, the Court's comments on the fundamental purpose of consultation applies to all entities – including and especially City Councils and administration – who are engaged in development and planning.

There was no consultation on the Current Riley Plan. On the contrary, looking at this from outside the black box, it appears that the intent was to push these drastic density increases through quickly with as little community engagement as possible. How else can you explain a process that:

- Releases significant changes just before Christmas, months before such changes are required to be brought to IPC;
- Schedules notification sessions during a one-week period just prior to Christmas;
- Provides invitations to those notification sessions with no link to the changed map, and no indication of the extent of recent changes;
- Schedules public comments to be due during Christmas holidays; and

- Sets a public IPC meeting with no attached agenda (which is necessary for registration) and the wrong date listed on the City website?

My concerns were not allayed by my attendance at the IPC meeting on January 8, 2025, where I saw representatives of developers stand up and praise the Current Riley LAP and confirm under questioning that they had been consulted about the recent changes.

I also watched Councillor Wyness, who we understand directed City administration to develop the recent changes, turn her chair partially away from the speaker's podium, lean back with her face towards the ceiling – seemingly feigning sleep or boredom - while a member of our community was speaking about their concerns. It was shocking to witness a councillor behaving in such a way in a City Council chamber. Whether deliberate or not, that behaviour sent a message – that she does not care about what people in this community have to say about planning matters that will have a massive effect on them.

How can we have any confidence in City administration, City Council, and the Current Riley LAP when “consultation” looks like that?

The Current Riley LAP feels like an invitation to developers to bulldoze much of North Briar Hill and Hounsfield Heights.

We ask that City Council revert to the May 2024 Riley LAP.

Sincerely,

Laura-Marie Berg & Jean Lacroix

## Calgary City Council Deputy Mayor Roster

List view

Monthly view

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### Other Events

Day	Date	Time	Meeting name	Description	Location	Meeting room
Monday	Jan. 1		<a href="#">Holiday</a>			
Wednesday	Jan. 10	9:30 a.m.	<a href="#">Infrastructure and Planning Committee</a>	Includes public presentation.	<a href="#">Municipal Building</a>	Council Chamber
Thursday	Jan. 11	1 p.m.	<a href="#">Calgary Planning Commission</a>		<a href="#">Municipal Building</a>	Council Chamber
Tuesday	Jan. 16	9:30 a.m.	<a href="#">Council meeting - Public hearing</a>	Public Hearing Council Meeting	<a href="#">Municipal Building</a>	Council Chamber
Wednesday	Jan. 17	10:30 a.m.	<a href="#">Nominations Committee</a>	UPDATED - New meeting	<a href="#">Historic City Hall</a>	Engineering Traditions Committee Room
Thursday	Jan. 18	9:30 a.m.	<a href="#">Audit Committee</a>		<a href="#">Historic City Hall</a>	Engineering Traditions Committee Room



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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] Murray

Last name [required] Desrosiers

How do you wish to attend? In-person

You may bring a support person should you require language or translator services. Do you plan on bringing a support person? No

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

2025-02-28 LTT City Council (Riley LAP).pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The amendments that were made to the Riley Communities Local Area Plan following the Infrastructure and Planning Committee meeting on October 16, 2024 super-sized the density in our community and do not respect the existing community, which was well established decades before the LRT arrived.

I respectfully request that the Phase 4 version of the Local Area Plan (being the version presented to the Committee on October 16, 2024) be the version that is approved. This version represents a reasonable balance and focusses the higher density development on the sites that are most appropriate, being the North Hill Mall and Louise Riley Library sites.



## MURRAY DESROSIERS, B.Comm., LL.B.

---

February 28, 2025

City Council:

Re: Riley Communities Local Area Plan

I am a resident of the community of Briar Hill where I have owned a home since 2011. I was attracted to this community because of its established character, single-detached homes, large mature trees, proximity to downtown and local schools. I am extremely concerned about the drastic changes that will occur in both Briar Hill and Hounsfield Heights should the Riley Communities Local Area Plan in its current form be approved by City Council.

### Blanket Rezoning

In May 2024, City Council approved blanket rezoning, which will allow for a wider range of housing types, such as rowhouses, townhouses and semi-detached homes. This was a significant change for our community, which had predominantly been zoned R-1 (single-detached homes).

In the short time since the blanket rezoning took effect, we have already seen development applications for two narrow infills, a semi-detached home with suites, and three row houses. Each of these developments (and those that will follow) will add more density to our neighbourhood.

We need to give blanket rezoning more time to operate to see how it will impact our community and push pause on the “super” density proposed for parts of our community in the Riley Communities Local Area Plan.

### The Local Area Plan

Our community was actively engaged in the development of the Riley Communities Local Area Plan up to the preparation of Phase 4, which was presented to the Infrastructure and Planning Committee on October 16, 2024 (hereinafter referred to as the “May 2024 LAP”).

At that meeting, the Committee directed Administration to: (1) prioritize greater density around Transit Oriented Development sites within the Riley Communities Local Area Plan; (2) focus on planning for growth and change that integrates multi-modal mobility and improved

citizen experience of land use development that enables walkability, community connections and integrated commercial and residential uses for all ages and abilities; and (3) report back to the Committee by the second quarter of 2025.

Based on this direction, Administration took what appears to be a mechanical approach to adding significantly more density around the Lion's Park LRT station. If a property was within 600 metres of the LRT station, it had its density increased from the May 2024 LAP. There was no consideration for the existing community, which was well established decades before the LRT arrived, and site access limitations (particularly for the northeast part of Briar Hill (south of 16<sup>th</sup> avenue and east of 19<sup>th</sup> street)). Furthermore, there was no consultation with the community on these changes, which were published in December 2024 and presented to the Committee on January 8, 2025 (hereinafter referred to as the "December 2024 LAP"). Why was this process rushed when the Committee had given Administration until the second quarter of 2025?

While transit-oriented development sounds great in theory, the configuration of the LRT line (single trains running the full length of the line) creates practical challenges. During the morning rush hour trains arrive at the Lion's Park station jam packed with riders from communities further up the line. Riders often have to wait for several trains to find one that has room for them.

Attached as Appendix A are the Building Scale Maps that show the changes from the May 2024 LAP to the December 2024 LAP. The changes to add additional density are denoted in the circles in Appendix A.

Attached as Appendix B are the Urban Form Maps that show the changes from the May 2024 LAP to the December 2024 LAP. Neighbourhood Connector now covers about half of the community, even though most of the community is comprised of quiet streets with limited infrastructure. I would also like to note that Neighbourhood Connector allows H-GO zoning, which permits extra tall and dense row houses and apartments/condos (which is a further densification from that permitted under the blanket rezoning) and small local-serving commercial along "higher activity streets". Other than 19<sup>th</sup> Street and the portion of 14<sup>th</sup> avenue west of 19<sup>th</sup> street, the areas now designated as Neighbourhood Connector are quiet residential streets and most certainly are not higher activity streets.

The requirement that existing stable communities should be respected is referenced in both the Municipal Development Plan and the Transit Oriented Development Guidelines. The Municipal Development Plan states: "ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern". The Transit Oriented Development Guidelines state: "each station exists in a

particular community context. Development should complement the existing development and help to enhance the local character”.

The additional density and reclassification to Neighbourhood Connector are not based on good planning principles, are in conflict with both the Municipal Development Plan and the Transit Oriented Development Guidelines and, therefore, should not be approved.

#### Request

The communities of Briar Hill and Hounsfield Heights were well established before the LRT was built. We understand that higher density is coming to our communities as a result of the blanket rezoning. That is a significant change in and of itself – give it time to breath. We are prepared to do our part and take on a reasonable amount of additional density to support the City’s housing strategy.

I respectfully request that the May 2024 LAP be the version that is approved. This version represents a reasonable balance and focusses the higher density development on the sites that are most appropriate, being the North Hill Mall and Louise Riley Library sites. The redevelopment of the North Hill Mall site at up to 27 storeys has the potential to add thousands of residents to our community. Furthermore, 14<sup>th</sup> avenue, the LRT line and the adjacent green space provide a transition to the established community to the south.

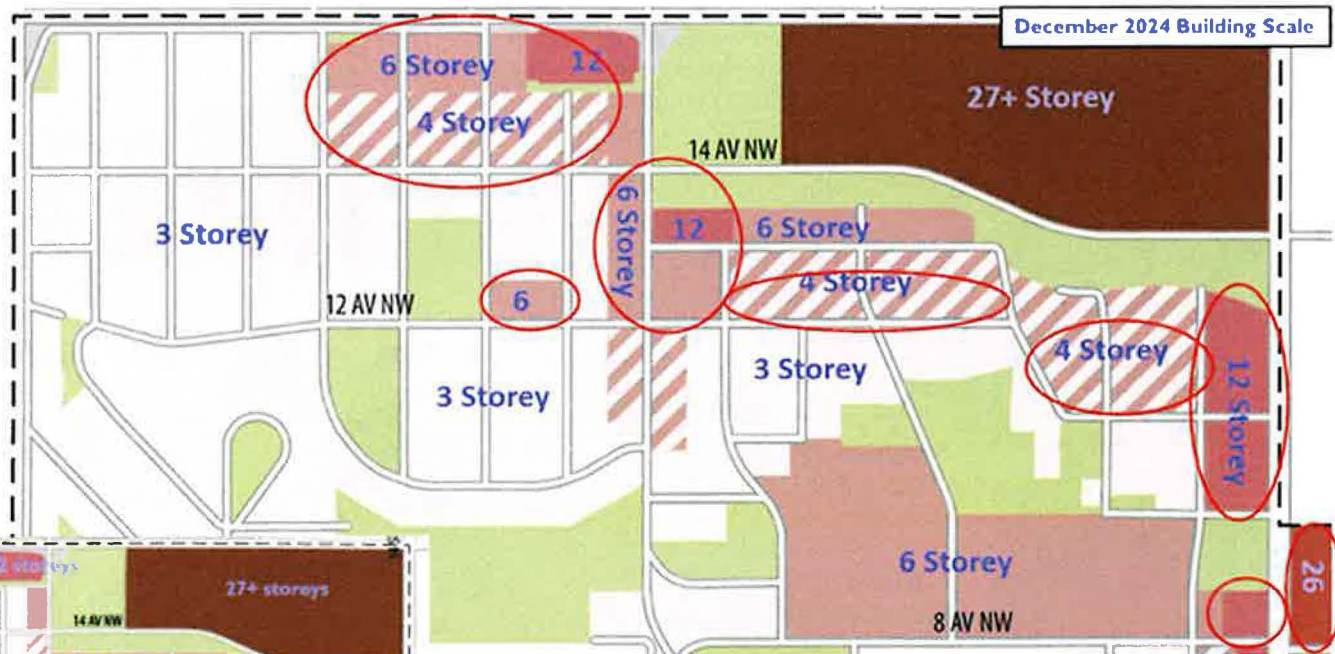
The local area plan can always be revisited in the future if amendments are needed. Let’s pick a reasonable starting point and go from there.

Yours truly,

(signed) “*Murray Desrosiers*”

## Appendix A

# Building Scale Map



- Spells out maximum heights allowed
  - Though another floor of 'amenity space' can be added
- No definite relationship with 'Urban Forms'
- Scale is the most important factor

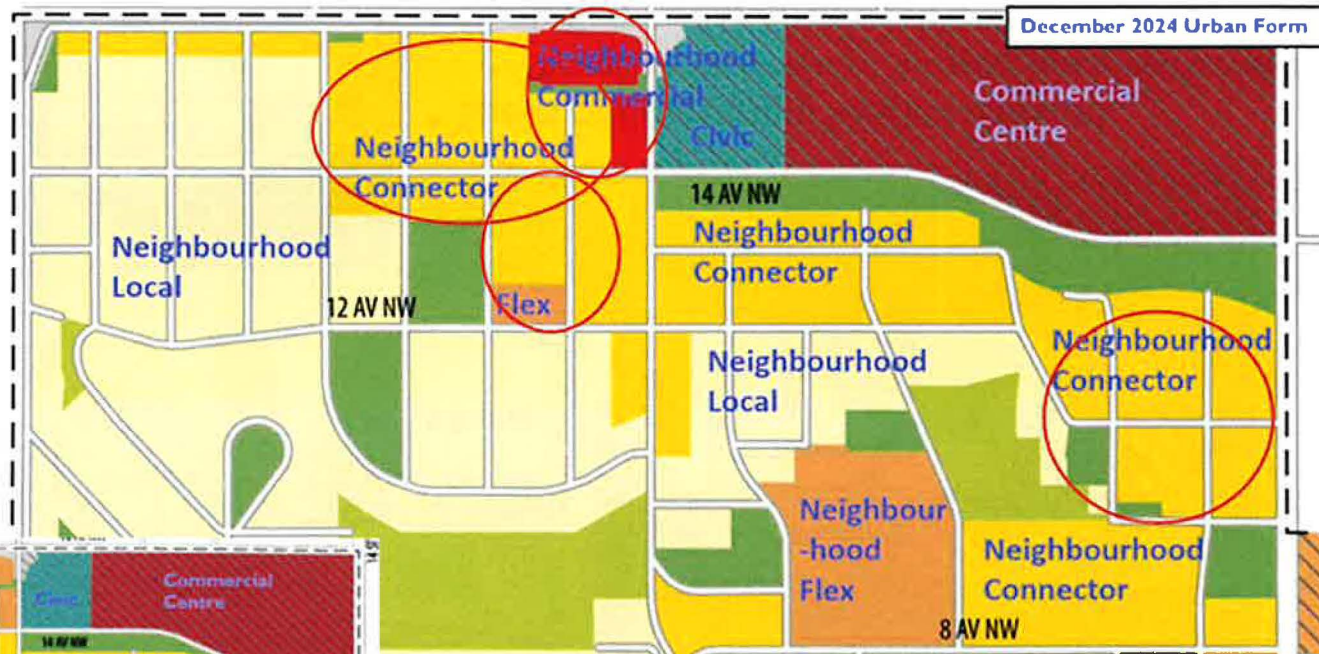


## Appendix B

# Urban Form Map

## Urban Form Categories

- Neighbourhood Commercial
- Neighbourhood Flex
- Neighbourhood Connector
- Neighbourhood Local
- Commercial Corridor
- Industrial General
- Natural Areas
- Parks and Open Space
- City Civic and Recreation



- 'Neighbourhood Connector' applied over about half of whole community now! including many quiet residential roads
  - Allows H-GO, or more if combined with higher scale
  - At odds with 'higher activity streets'
- NO consideration of egress, topography for this or scale map
- 'Neighbourhood Commercial' on Lions Park Plaza and Highlander
  - Broader range of commercial allowed

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required]

Keli

Last name [required]

Pollock

How do you wish to attend?

In-person

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

no

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2024

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Riley Local Area Plan - 7.3.2

Are you in favour or opposition of the issue? [required]

In opposition





ATTACHMENT\_01\_FILENAME

Council\_Presentation.pdf

ATTACHMENT\_02\_FILENAME

Letter to Council March4\_25.pdf

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

**March 1, 2025**

**Keli Pollock  
1519 21A St NW  
Calgary, AB**

**Public Hearing on Riley Local Area Plan. March 4, 2025**

Dear Mayor Gondek and Councillors,

I am writing regarding the substantial revisions recently made to the Riley Local Area Plan for Briar Hill/Hounsfield Heights. As a resident who participated in the collaborative planning process over the past three years, I'm deeply concerned about the significant alterations made to our community plan in the final weeks before Council consideration.

I understand and support the need for increased density in our city. The new citywide zoning changes already allow for duplexes, fourplexes, townhomes, and laneway homes throughout our neighbourhood, housing options we understand and accept.

However, the revised plan presents several critical issues:

1. **Lack of Transition Zoning:** The new plan permits 4-6 and 12 storey buildings directly adjacent to single-storey homes without appropriate height transitions, abandoning the thoughtful approach that was carefully laid out in the October 2024 version of the plan. This abrupt juxtaposition contradicts established urban design principles that recommend gradual height increases between different building forms. The October 2024 plan properly incorporated these step-down transitions that would have maintained community character while still achieving density goals.
2. **Community Fabric Disruption:** The concentrated upzoning of over half of our neighbourhood threatens the social connections that define our community. The real social impacts of rapid neighbourhood transformation are often overlooked in density-focused planning. When established homeowners are gradually displaced through redevelopment, we lose informal support networks developed over decades—neighbours who look out for each other and maintain our collective history. These social connections take generations to rebuild and cannot be replicated in new developments.
3. **Disproportionate Impact on Relatively Attainable Housing:** The revised plan disproportionately targets the original bungalows in our neighbourhood. These 1950s homes, while not "affordable" in the strict sense, represent relatively attainable housing stock within the inner city where lower purchase prices (compared to new construction) allow middle-income families to purchase and phase renovations over time as budget allows. The replacement housing is almost always substantially more expensive, further reducing housing options for middle-income families seeking to live in established inner-city neighborhoods.

4. **Environmental Concerns:** Demolishing structurally sound 1950s homes wastes their embodied carbon and creates significant construction waste. It takes decades for a new energy-efficient building to overcome the negative climate change impacts created by its construction. Rehabilitating existing buildings is significantly more environmentally sustainable than demolition and new construction, particularly in our northern climate. Additionally, we risk losing our neighbourhood's valuable 75-year-old tree canopy, which provides essential ecosystem services including air purification, temperature regulation, and stormwater management particularly important in Calgary's climate.
5. **Last-Minute Changes Without Adequate Consultation:** The timing of these substantial revisions in the final weeks before Council consideration, combined with incorrect meeting information being posted and a minimal response window, has severely limited meaningful community input on significant changes to a plan that had been developed collaboratively over three years.

The May 2024 version of the Riley Local Area Plan presented in October already addressed density needs through thoughtful transitions and careful placement of larger buildings - a balanced approach developed through genuine community consultation over three years. This collaborative plan thoughtfully balanced density increases with neighbourhood character.

I respectfully ask Council to reject these last-minute rezoning changes and return to the October 2024 version of the Riley Local Area Plan - a plan our community helped shape through genuine collaboration. This version reflects the true spirit of community engagement while still meeting the city's density goals.

Thank you for your consideration.

Sincerely,

Keli Pollock

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Please note that your name and comments will be made publicly available in the Council or Council Committee agenda and minutes. Your e-mail address will not be included in the public record.

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First name [required]

Geri

Last name [required]

Ramsay

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

Riley LAP-March 4 2025 meeting submission.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)



GERI RAMSAY

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February 21, 2025

Dear Mayor and Councillors,

I am writing to you as a constituent of Ward 7, a resident of Briar Hill and a homeowner concerned about the most recent proposed changes to the Riley LAP and Municipal Development Plan.

In June of 2023, I purchased my beautiful 1952 bungalow on 21a Street., just off 14th Ave., and was drawn in by the quiet tree-lined streets, well maintained homes and green spaces as well as by the easy walking distance to shops and Lions Park. Newly retired, I could easily see myself aging in place and was willing to pay the premium to do so in such a lovely neighbourhood.



I understood neighbourhoods evolve over time and there would be some change and densification but I could not have imagined such broad sweeping changes that would allow a six storey complex in a neighbourhood of bungalows.

When I first participated in the various engagement opportunities leading up to the blanket rezoning decision and during the development of the Riley LAP, I was primarily concerned about the scale of developments, the impact on the leafy streetscape as well as noise and traffic.





## GERI RAMSAY

---

I attended three workshops in total and followed the relevant media with interest, reassured somewhat by repeated promises that context and character would be taken into account with each development application and that there were rules around numbers of trees and streetscapes.

But since those promises, there have been development applications that, through a lens of context and character, seemed clearly non-contextual and yet have moved forward - most recently, an application for a massive 12-plex on a beautiful street of bungalows.

In a recent statement to media regarding proposed changes to the Green Line, Mayor Gondek remarked that it is important to 'see the area in person and hear from - Calgarians', that the changes would alter the landscape, character and traffic flow. Well, I say Amen to all of that. Please come and take in the character of our community. Please take it into account and allow us to participate in the future of our neighbourhoods.

Our Community Association has made repeated attempts and given considerable effort to collaborating solutions that allow for reasonable densification while retaining community character. These seem to have gone unheeded.

Add to this and what seems an egregious breach is the proposed changes to the Municipal Development Plan that replace established context and character, promised during the engagement process, with that of 'future context'. I can only assume this means a context of Mayor and Councils' choosing, reached only after the character of a community has been irretrievably altered.

Faith in government depends on keeping promises. Mayor Gondek promised she has learned the lesson about listening. She and workshop facilitators promised the assessment of context and character would be primary considerations.

Please keep your promises and allow constituents a role in their community development. "Great cities are a collection of communities that have shaped the neighbourhoods they live in, boasting their own identity but always inherently linked to the overall experience and story of the city."



GERI RAMSAY

I want to know that community members have a real hand in shaping my neighbourhood. I would like to see the Riley LAP revised with the latest round of increased densification removed and considerations of current context and character retained in the Municipal Development Plan.



Sincerely,



Geri Ramsay

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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] Jennifer

Last name [required] Doty

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition



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ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Comments included in motion being presented by Councilor Wong

### **Comments for the March 4 reading of the Riley Communities Local Area Plan:**

Submitted by Jennifer and Michael Doty 531 18A Street NW

In October 2021, the West Hillhurst Planning Committee wrote (in connection with LOC2021-0080): “It is the request of the WHPC that, as part of the Riley Communities LAP process and individual application review, special consideration be given to future 19 Street land use amendments and in particular, the properties north of 2 Avenue along the east side of 19<sup>th</sup> Street NW which have unique constraints compared to the rest of the street.”

With this in mind, we can see that some consideration has been given to this unique stretch of land but request that the Riley Communities Local Area Plan go further and change the Urban Form to Neighborhood Local (Map 3) and the Building Scale to Limited (Map 4). Mixed-use development along this stretch causes logistical, safety, shadowing and privacy concerns.

The stretch of land along the **east** side of 19<sup>th</sup> Street NW from 2<sup>nd</sup> Avenue to 6<sup>th</sup> Avenue is a unique stretch of land because:

1. There is **no laneway** between 19<sup>th</sup> Street NW and 18A Street NW. This creates major challenges for mixed-use development along the east side of 19<sup>th</sup> Street NW (garbage, recycling, deliveries, vehicle access).
2. The lots in this unique stretch are **narrower and shorter** than the standard 50'x120' lot, which exacerbates the privacy and shadowing impacts on adjacent properties which would result from height increases, massing and expanded lot coverage.
3. Along the east side of 19<sup>th</sup> Street from 2<sup>nd</sup> Avenue to 6<sup>th</sup> Avenue, there are four newish RC2 homes and the remainder are post WW2 Victory Homes (rectangular shape with steep 12:12 slope). There has been **very little development** along this unique stretch because of the lot constraints. For example, the two lots closest to 6<sup>th</sup> Avenue were redesignated as MCG, but the SDAB overturned the DP. \*See below for more information.
4. **Several avenues intersect** with this unique stretch of land. The intersection with 3<sup>rd</sup> Avenue, especially, is a busy crosswalk for students going to/from school and parents taking children to daycare at the Community center. With no back lane, increased traffic entering or exiting Mixed-use development along this stretch (and crossing sidewalks) increases danger for pedestrians and cyclists.
5. Street oriented commercial and mixed-use development fronting onto 19<sup>th</sup> Street NW stretches from Kensington Road to 3<sup>rd</sup> Avenue on the west side of 19<sup>th</sup> Street. It also stretches from Kensington Road to 2<sup>nd</sup> Avenue on the east side. This type of development, however, on both sides of the street, is **ONLY present in sections where there is a back lane**.

\*Example: **526 19<sup>th</sup> Street NW (LOC2021-0080, DP2023-08098, SDAB2024-0027)**

- The developer owns 2 lots plus a triangle of land purchased from the city. The three pieces of land have been amalgamated into one parcel called 526 19<sup>th</sup> Street NW. This is along the same unique stretch of land as described above. The developer originally applied for MU1

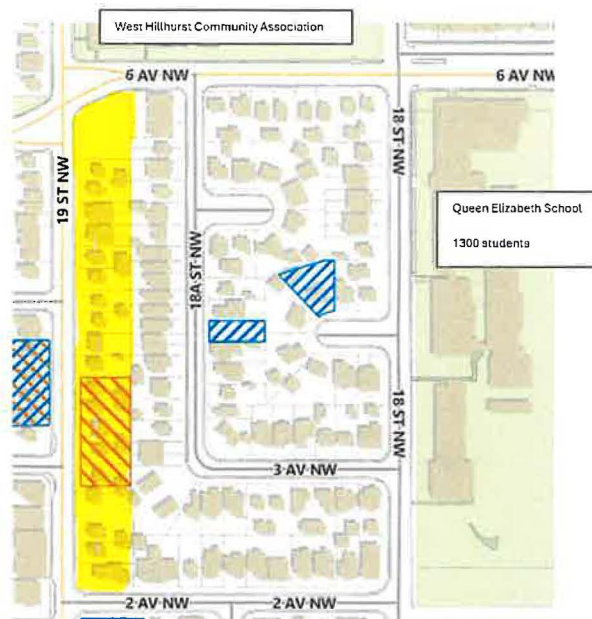


land use change for this site in 2021. After city review and opposition from residents and WHPC, the city encouraged the developer to change to an MCG land use change (Benjamin Bailey, File Manager). At council, the land use change was only given first reading, and a DP had to be submitted and approved before second and third readings would be given.

- The DP was submitted and approved by city administration and so MCG land use change was given second and third reading and then approved.
- Neighbors with adjoining property lines appealed the DP to the SDAB, and the DP was overturned. As the SDAB wrote (SDAB2024-0027 page 20): “However the Board determines, through the information provided, that this site cannot be developed to the density approved as there are many unique elements to the site that can and do restrict site density development. The Board understands that this land use district has a series of rules applied for the district that primarily require a project to conform to the character and details of the area in which it is located. Because of the district rules, and the site’s physical limitations, the Board determines that this project exceeds the functional density of the site, does not conform to the community context, creates relaxations beyond what is reasonable in the context, and therefore negatively, substantially, and materially impacts the immediate neighbours unduly in their use and enjoyment of their property.”

**In Summary:**

- The stretch of land on the east side of 19<sup>th</sup> Street NW from 2<sup>nd</sup> Avenue to 6<sup>th</sup> Avenue is a unique stretch of land, primarily because there is no rear lane but because of other lot constraints as well (as listed above).
- This unique stretch of land has been given some consideration in the Riley Communities Local Area Plan, but there needs to be further restrictions on densification and intensification. We recommend that the Riley Communities Local Area Plan change the Urban Form to Neighborhood Local (Map 3) and the Building Scale to Limited (Map 4).



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First name [required] **Meghan**

Last name [required] **Hanson**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters **Item 7.3.2: Riley Communities Local Area Plan**

Are you in favour or opposition of the issue? [required] **In opposition**

ATTACHMENT\_01\_FILENAME

Meghan Hanson Riley Park LAP Comments.docx

ATTACHMENT\_02\_FILENAME

Meghan Hanson Riley Park LAP Comments.pdf

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Comments included in motion being presented by Councillor Wong

My name is Meghan Hanson and I live at 437 18A Street NW. I am fully supportive of the development and modernization of not just the Riley Park area, but also 19<sup>th</sup> Street NW specifically. The Riley Park Land Area Plan ("Riley Park LAP") has done a fantastic job of envisioning the future of this Calgary neighbourhood by outlining core values to be upheld throughout the development process and by targeting key areas for growth within those guidelines. However, there is one stretch of land – the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW – that the Riley Park LAP has classified in a way that is in direct conflict with its vision and core values. The purpose of my comments below is to explain why this unique block in West Hillhurst must be re-designated before the Riley LAP is finalized in order for 1) the vision and core values of the Riley Park LAP to be sufficiently met, 2) for community members (pedestrians in particular) to be safe, and 3) to avoid a waste of the council's & community's time and resources driven by applications for developments that are not a fit for this stretch of land.

### Proposal

The east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is currently designated as "Neighbourhood Connector" per Map 3: Urban Form and "Low-Modified (up to 4 Storeys)" per Map 4: Building Scale. **This block should be redesignated as "Neighbourhood Local" and "Limited (up to 3 Storeys)."**

### Reasoning

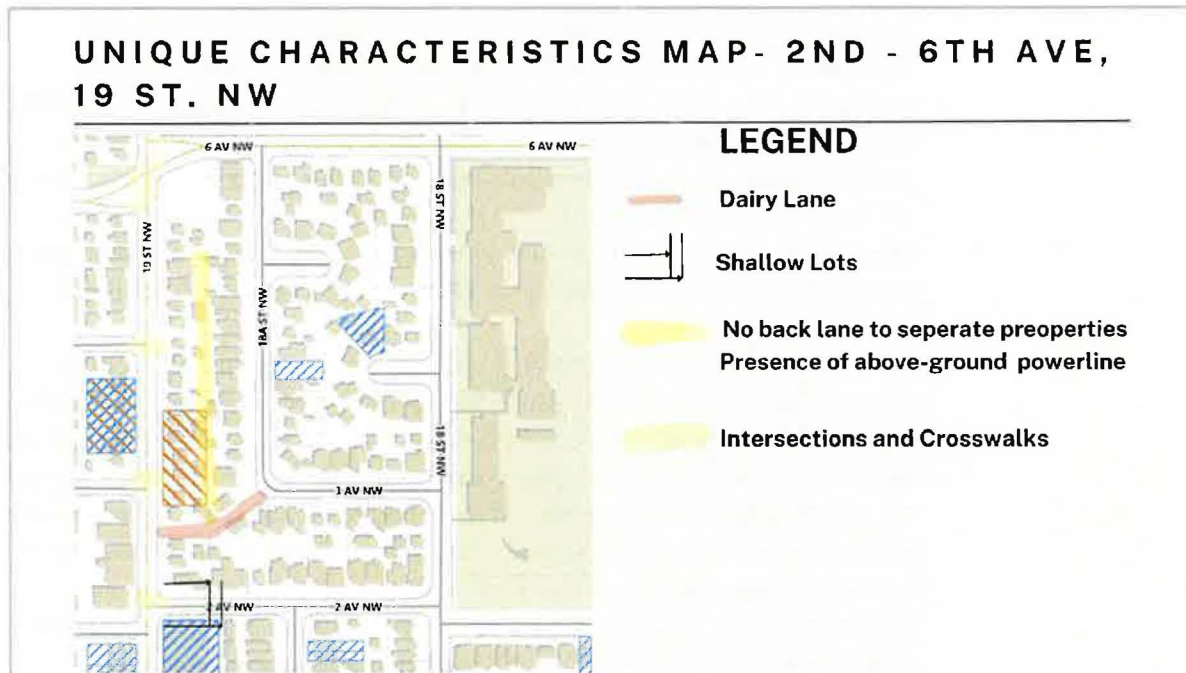
The east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is a very unique stretch of land in West Hillhurst because **it does not have a back lane**. The lack of a back lane in conjunction with well-established and highly utilized pedestrian and bike routes in this area (that the Riley Park LAP wants to expand and enhance) will create many logistical and safety issues if Neighbourhood Connector 4 Storey buildings are erected here. In fact, **the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW is the only Neighbourhood Connector & Low-Modified land parcel on the Riley Park LAP (as outlined on Maps 3 & 4) that does not have a back lane**. The inclusion of this stretch of land may have even been an error in this LAP draft given how the council clearly sees how back lanes are paramount for Neighbourhood Connector & Low-Modified areas.

Key differences between these designations that would either create or prevent logistical, safety, and climate issues on this unique land parcel are:

- Neighbourhood Connector & Low-Modified buildings allow for grade-level commercial businesses, whereas Neighbourhood Local & Limited buildings do not. Per the LAP, these commercial businesses should be "designed to mitigate impacts on adjacent residential uses" (section 2.2.1.5.c). Commercial businesses located on a street with no back lane will create many safety & logistical issues for pedestrians, cyclists, and adjacent residences (see details below).
- Neighbourhood Connector areas should "mitigate impacts, such as noise and vehicle circulation, on adjacent residential uses" (section 2.2.1.5.e.ii), which will be impossible to achieve on a road that does not have a back lane.
- Neighbourhood Local & Limited buildings should "be designed to complement the surrounding context and consider the impacts of massing, lot coverage, and setbacks on the following: i.



Access to sunlight and shade on adjacent parcels; and ii. Protection of existing, healthy trees or landscaping on the parcel, where appropriate” (per 2.2.1.6.b). A Neighbourhood Local & Limited scale designation for this parcel of land with no back lane will allow developments to align with the Riley Park LAP’s climate resilience goals, whereas a Neighbourhood Connector & Low-Modified designation will be in direct conflict with those goals.



*Vision Elements & Core Values Put at Risk from No Back Lane with Current Land Designation*

1) “Safe and Accessible Communities”

- One of the Riley Park LAP’s key goals is to “ensure that safety and accessibility are key considerations in public space improvements, new building design, and in considering improved transportation options, especially around transit station areas.” A Neighbourhood Connector & Low-Modified designation on this land parcel with no back alley would not allow the community to achieve this goal.
- We must ensure the safety of children and the elderly, who are highly concentrated in this area from community mainstays like Queen Elizabeth School and General deLalanne Manor and who are connected by many crosswalks, bike lanes, and unique walkways like Dairy Lane.
- Lack of a back lane would force the following items to all be managed directly on 19<sup>th</sup> St NW, in the middle of pedestrian and cyclist pathways: 1) entering & exiting underground parkades, 2) collection of large commercial garbage dumpsters, and 3) high volume commercial & residential deliveries.
- These required logistics of Neighbourhood Connector 4 Storey buildings would increase vehicle traffic, particularly of large commercial garbage & delivery trucks, to cause the following pedestrian safety issues and therefore reduced foot traffic:



- i. Increased volume of commercial vehicle traffic crossing over the established **bike lane** on the east side of 19<sup>th</sup> St NW and large garbage dumpsters parked in the middle of the east-side 19<sup>th</sup> St bike lane as they wait to be collected will create clear obstacles and therefore safety issues for cyclists, which is at odds with Calgary's 5A Network goals.
  - ii. Higher volume of delivery vehicles and vehicles accessing required underground parkades for these buildings will need to cross over the highly frequented **sidewalk** on the east side of 19<sup>th</sup> St NW, putting pedestrian safety at risk. Pedestrians who utilize "**Dairy Lane**" (the walkway just north of 2<sup>nd</sup> Ave NW that connects 18A St NW and 19<sup>th</sup> St NW, which is a favourite of Queen Elizabeth students commuting to/from school), the three highly frequented **crosswalks** on 19<sup>th</sup> between 2<sup>nd</sup> Ave NW and 6<sup>th</sup> Ave NW, and the east 19<sup>th</sup> St sidewalk would become less visible to traffic from road blockades created by garbage dumpsters waiting for collection and temporarily parked delivery vehicles along the east side of 19<sup>th</sup> St.
  - iii. The designation of east 19<sup>th</sup> St NW as a Neighbourhood Connector area will create these pedestrian safety issues, leaving community members no option but to avoid increasing their foot traffic on 19<sup>th</sup> St. This is starkly at odds with the Riley Park LAP's pedestrian-focused goal for the future of 19<sup>th</sup> St NW. If however this stretch of land was designated as Neighbourhood Local with a Limited scale, these safety issues would disappear because there would be no buildings with grade-level commercial businesses that would require 1) an underground parkade with a 19<sup>th</sup> St entrance/exit, 2) commercial-sized garbage dumpsters that must be collected on 19<sup>th</sup> St, and 3) a large increase in frequency of deliveries from commercial vehicles.
- 2) "Moving to and Through the Riley Communities" – the pedestrian experience would not be enhanced and in fact, pedestrian traffic would decline along 19<sup>th</sup> St NW if buildings with grade-level commercial businesses under a Neighbourhood Connector & Low-Modified designation do not have access to a back lane.
  - a. The Riley LAP states that multi-unit residential/commercial developments should provide access to off-street parking and loading areas from the lane. The only way to provide off-street parking for these commercial buildings would be to create **underground parkades** with access directly on 19<sup>th</sup> St NW, and it would be impossible to create loading areas from a lane because there is no back lane. The existing commercial developments on 19th Street (to the south and the west) all have access to a back lane where their entrances/exits to underground parkades exist, which allows for these developments to be aligned with this mobility goal. The lack of a back lane on this specific land parcel, if designated as a Neighbourhood Connector, will cause 1) an increase in vehicle traffic needing to enter/exit these underground parkades directly on 19<sup>th</sup> St, and 2) loading areas to be built directly on 19<sup>th</sup> St NW, forcing large vehicles to cross over the existing bike lane and sidewalk, which will disrupt the pedestrian experience and create safety issues.
  - b. **Garbage collection** for Neighbourhood Connector buildings with grade-level commercial businesses will also create issues on a street with no back lane. The only logistical

solution to garbage collection from businesses would be to have large commercial garbage dumpsters wait to be collected directly on 19<sup>th</sup> St, which will act as vehicle, cyclist, and pedestrian blockades. This is directly at odds with the Riley Park LAP pedestrian experience goal. If this land parcel was designated as Neighbourhood Local and Limited Scale, then there would be no need for businesses to have garbage collected in large dumpsters on the street, allowing for the LAP's pedestrian goal to be met. Additionally, how would waste from certain operations (i.e. grease traps) be collected without a back lane? Without a back lane, would commercial venting be pointed out the back of the building into neighbours' backyards on 18A St?

- c. An increase in **commercial & residential deliveries** directly on 19<sup>th</sup> St would also occur on this land parcel if designated as Neighbourhood Connector since there is no back lane. Delivery trucks would be forced to block vehicle, cyclist, and pedestrian traffic while temporarily parked on 19<sup>th</sup> St as they make their deliveries.
- d. Designating this area as Neighbourhood Local and Limited Scale would allow pedestrians to continue to move freely & safely by 1) removing the need for underground parkades, 2) keeping 19<sup>th</sup> St garbage collection plans unchanged (i.e. small residential garbage cans will continue to be collected on 19<sup>th</sup> rather than large commercial dumpsters), and 3) keep 19<sup>th</sup> St deliveries to lower volume residential needs rather than larger commercial deliveries. And additionally, there would still be the opportunity for developers to create more volume of and therefore affordable home options on this land parcel.

### 3) "Climate Resilience"

- a. Another key goal of the Riley Park LAP is to "improve energy use, reduce greenhouse gas emissions, and better adapt to climate-related hazards in buildings through a range of initiatives such as building design, increasing the urban tree canopy, and creating more complete communities."
- b. Many neighbours along 18A St NW (who share a backyard with the section of 19<sup>th</sup> St NW at hand) have participated in Canada's Federal and Calgary's city solar panel programming, some paying up to \$25,000 to install solar panels on their homes. Allowing 4 storey buildings to be erected directly next to these solar panelled homes without the buffer of a back lane would render the hefty investments that the city and community members have already made inoperable from a large increase in shadowing, which would likely require the city to pay back 18A neighbours for their now obsolete investments.
- c. 4 storey Neighbourhood Connector buildings built on a street with no back lane would require underground parking, and these underground parkades would put the root system of existing trees along 19<sup>th</sup> St and 18A St at risk. New trees installed alongside these larger buildings with no back lane would also compound the shadowing issue, blocking existing solar panels further, not to mention be in direct conflict with section 2.2.1.4.c.iii, which states that Neighbourhood Connector areas should consider shadowing impacts on neighbouring properties.

### 4) Comments around the Riley Park LAP section 2.5.6.1

- a. I am arguing against section 2.5.6.1.B for this unique stretch of land which states that "Developments are encouraged to share mutual driveway accesses." It is my understanding that this principle came about after a review from the mobility team,

which said that we should avoid more driveway entrances along the east side of 19<sup>th</sup> St between 2<sup>nd</sup> and 6<sup>th</sup> Aves because they would create more dips in the ground for pedestrians. It is clear to me that the mobility team was not made aware of the alternative to additional dips in the sidewalk, which is all the items I listed above: more large commercial vehicles & garbage dumpsters crossing over bike lanes and sidewalks right by Dairy Lane and 3 key crosswalks in the neighbourhood. I am arguing that way more pedestrian safety risk would arise from the latter option because of a Neighbourhood Connector/4 storey designation than from having a few more dips in sidewalks, which are 5A friendly, that would come with a Neighbourhood Local/3 storey designation.

- b. 2.5.6.1.C says there should not be any newly built single-detached, semi-detached, and duplex housing forms “with front garages.” It would be impossible to build any sort of housing form without a front garage along the east side of 19<sup>th</sup> St NW between 2<sup>nd</sup> and 6<sup>th</sup> Aves, and I am arguing that there is more pedestrian safety risk from having fewer front garage entrances from 4-storey commercial buildings than from having more driveway entrances without the commercial vehicle risk.
- c. 2.5.6.1.D says that developments that share a property line with single-detached, semi-detached, and duplex housing forms “should step back the building above the third storey along the shared property line.” The depth of the lots on the east side of 19<sup>th</sup> St between 2<sup>nd</sup> and 6<sup>th</sup> Aves is **too shallow** to accommodate this sort of a ruling – i.e. there is not enough lot depth to allow for the creation of a 4<sup>th</sup> storey with this setback rule. So given all of the concerns we have, the max allowable building height on this block should be 3 storeys.
- d. 2.5.6.1.F says that developments along 19<sup>th</sup> St NW should exceed tree requirements to help expand the tree canopy of this area. As explained above, the current designation of this stretch of land as Neighbourhood Connector with Low-Modified 4-storey height will not allow this to occur.

#### *Examples of Problematic & Denied Proposed Land Use Redesignations and Developments in this Area*

There is already precedent set by this council that buildings that fall under the Neighbourhood Connector and Low-Modified Scale (i.e. MU-1 & similar) would not function and therefore are not allowable on the east side of 19<sup>th</sup> St NW between 6<sup>th</sup> Ave NW and 2<sup>nd</sup> Ave NW. If the Riley Park LAP does not change the designation of this stretch of land from Neighbourhood Connector & Low-Modified Scale to Neighbourhood Local & Limited Scale, then developers will continue to apply for land re-designations such as MU-1, which community members will continue to vehemently oppose for all the reasons laid out in this commentary, unnecessarily draining the council's time and resources.

The aforementioned precedent was set by application LOC2021-0080. The proposed development on this originally R-CG parcel was initially an application for MU-1 but was swiftly declined by the City given the unique characteristics of this stretch of 18A. Ultimately, the M-CG zoning was approved by the city but refused by the SDAB because of density and privacy concerns and the plethora of relaxations related to unique lot restrictions (LOC 2021-0080, DP2023-08098, SDAB2024-0027).

There is now a new application for land re-designation from R-CG to MU-1 on the east side of 19<sup>th</sup> St NW that does not have a back lane (application LOC2024-0297), which the community strongly opposes for all the reasons (and more) outlined in this commentary. If the Riley Park LAP changes its designation of the east side of 19<sup>th</sup> St NW from Neighbourhood Connector & Low-Modified Scale to Neighbourhood Local to Limited Scale, developers would be prevented from wasting our council members' and community members' time and resources by submitting applications for zonings & buildings that do not 1) make logistical sense for this unique block in West Hillhurst and 2) do not align with the Riley Park LAP's vision & core values. Instead, developers would have a clear roadmap for what buildings they should be proposing for this block that increases housing density in a safe and effective way that is in line with the vision and core values of the Riley Park LAP.

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First name [required]

Sandra

Last name [required]

Johnson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition



ATTACHMENT\_01\_FILENAME

Objection to Riley Local Area Plan 2025-03-04.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I am writing to formally object to the Urban Main Street proposed in the Riley Area Plan (RAP) south of 16<sup>th</sup> Avenue to 14<sup>th</sup> Avenue and between 19<sup>th</sup> Street NW west to 22 Street NW. It violates the principles of gentle densification, contradicts the Hounsfield Heights/Briar Hill Area Redevelopment Plan (ARP), and consequently the RAP, and fails to provide meaningful value to either the neighbourhood or the housing crisis.

This portion of the RAP (Riley Area Plan) is not responsible, gradual infill, it is an aggressive overdevelopment which seeks to construct extremely high-density housing, an overdevelopment that prioritizes maximum unit count over livability, infrastructure, and community integrity.

#### 1. This is Not Gentle Densification — It's an Overdevelopment.

Gentle densification means gradually introducing duplexes, triplexes, or laneway homes in a way that integrates with existing streetscapes.

This project jumps from single-family homes to apartment buildings and commercial areas, creating an abrupt and overwhelming change.

The result is a jarring, out-of-scale development that erodes the neighbourhood fabric instead of complementing it.

This development completely disregards your own Low Density Residential Housing Guidelines whereby it states that "A strong emphasis is placed on encouraging development to respect and enhance the overall quality and character of the street/community in which it takes place." This is an overblown, over the top development that does absolutely NOTHING to respect and enhance the overall quality and character of the streets/community".

#### 2. This Project Does Not Benefit the Housing Crisis

This is not affordable housing. It simply maximizes density for profit, without making housing truly accessible to those who truly need it.

Cramming what amounts to thousands of residents into such a small area doesn't meaningfully address housing supply, it's a drop in the bucket that comes at a huge cost to neighbourhood livability.

Thoughtful infill balances density with quality of life, this project prioritizes quantity at the expense of both.

#### 3. This Proposal Violates the Area Redevelopment Plan (ARP)

The Hounsfield Heights/Briar Hill ARP was created to ensure context-sensitive development. This proposal fails to meet multiple key goals:

##### 1.3.1 Growth Must Be Managed, Not Forced

This project ignores the structured growth outlined in the ARP and forces excessive density into an area designed for low-density living.

##### 1.3.2 The Neighbourhood's Stability is at Risk

The ARP emphasizes gradual, compatible development, yet this project destabilizes an established neighbourhood by cramming hundreds of units into a limited area.

##### 1.3.3 This is Not Family-Oriented Housing

The lack of outdoor space, setbacks, and privacy makes these units unsuitable for families, contradicting the ARP's goal of maintaining a livable, family-friendly community.

#### 1.3.4 The Physical Character of the Neighbourhood is Being Erased

The oversized massing, lack of green space, and minimal setbacks completely disrupt the visual and functional character of the area.

#### 1.3.5 It Does Not Respect Traditional Neighbourhood Character

Every home on these blocks and the adjacent ones are a single-family home with green space — this proposal wipes that away.

#### 1.3.7 It Harms, Rather Than Strengthens, the Community

The ARP seeks to enhance the neighbourhood, but this project degrades it by adding congestion, parking issues, and a starkly out-of-place development.

#### 4. Infrastructure is Not Designed for This Level of Density

The neighbourhood was built in the 1950s for single-family homes, and its roads, sewer, and utilities were never designed for this kind of density.

Without significant infrastructure upgrades, this project risks overloading aging systems, causing long-term service and maintenance issues.

#### 5. This Development is Being Pushed in Certain Areas — Why Not Elsewhere?

The more expensive streets south of 14th Avenue are not seeing this level of redevelopment, raising questions of fairness.

If the city is serious about densification, it should apply it equitably, not just target select areas.

#### 6. A Better Alternative: Busy Corridors

If the city wants to increase density, it should redevelop the busier corridors, or use existing commercial sites suited for multi-unit housing.

Instead of shoehorning excessive density into an inappropriate area, this would provide higher-density housing in a way that makes sense for the community.

#### Conclusion: This Proposal Should Be Rejected

This project is not gentle densification — it is an aggressive overbuild that erodes livability, undermines neighbourhood character, and fails to provide meaningful housing benefits. While densification is important, it must be done in a way that integrates with the community, not forces dramatic, destabilizing changes.

I strongly urge the planning committee to reject this proposal and encourage a more balanced, context-sensitive development that respects the principles of the ARP and the integrity of this neighbourhood.

Thank you for your time and consideration.

Sincerely,

Sandra Johnson

1524 - 21 Street NW

Phone: [REDACTED]

Email: [REDACTED]

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First name [required]

Darwin

Last name [required]

Bateyko

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Approval of the Riley Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition

ATTACHMENT\_01\_FILENAME

Council Comments March 2025.docx

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Results of the Public Engagement process undertaken by city administration was flawed and the 'What we Heard' and 'What we did Reports' does not include concerns submitted in written form during the engagement process. The city 'Engage Team' confirmed community comments from 18 households were absent in any formal way from the information that was circulated internally within city administration, including internal committee engagements, for consideration during the development of the Riley LAP process. This includes but not limited to creosote contamination concerns that is an underlying planning considerations and development constraint that is not addressed in the current LAP. Outlining existing planning considerations and development constraints is the raison d'etre of an LAP.

Council should add the following amendments to Riley LAP and evidence supporting the amendments can be found in the accompanying document.

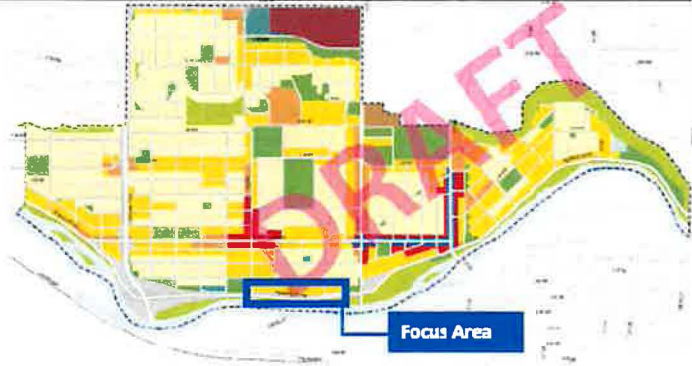
- That the Westmount Boulevard area, as shown as "focus area" in the above map, be designated as Neighbourhood Local (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of "up-to 4 stories" (and not 6 stories as proposed).

- That the Plan include policy regarding development on contaminated sites that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.



## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



### LAP PLAN AMENDMENTS:

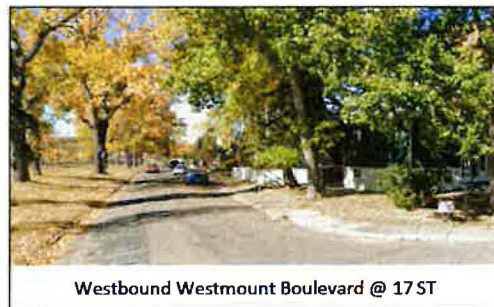
1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

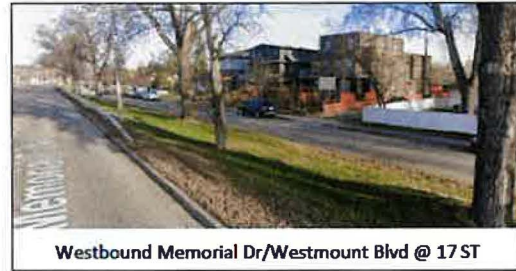
- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:

- This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



- downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**

- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



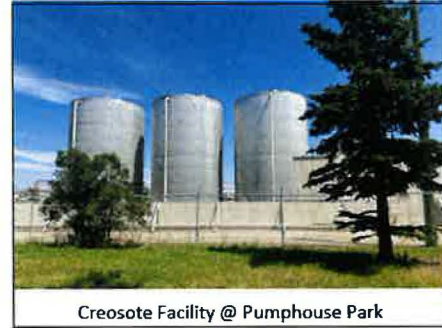
- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.



- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. *They considered this a petition and dismissed the substantial feedback from 18 households.* For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.

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First name [required] Susan

Last name [required] Rancourt

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Item 7.3.2 Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required] In opposition



## Public Submission

CC 968 (R2024-05)

ATTACHMENT\_01\_FILENAME

Submission for March 4th meeting and Riley LAP agenda item.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

These comments are the same as the one that are included in the motion being presented by Councillor Wong, which I sent to Councillor Wong and all Wards on February 27, 2025.



**This is an objection to the revised Riley LRP presented to the IPC on Jan 8<sup>th</sup>, 2025. This is also a request that the Oct 16<sup>th</sup> Riley LAP be approved by Council as this LAP balanced a myriad of factors to arrive at the best outcome for all interested parties.**

During my holidays from Dec 11<sup>th</sup> 2024 to Jan 10<sup>th</sup> 2025, the Riley LAP was revised and approved by the IPC. I had **no idea** this was happening and **no chance** to comment. The way that these significant changes to the Riley LAP were rushed through over the Christmas holidays is shameful.

On Oct 29<sup>th</sup>, Council said that the Oct 16<sup>th</sup> Riley LAP failed to provide sufficient density around TOD sites. The reasons for reaching this conclusion are not clear. Maybe Council members decided that, by comparison to **other** LAPs or areas of the City, that density in the Riley areas just wasn't enough?

Judging by the size of the Administration group at the Oct 16<sup>th</sup> hearing, a lot of people with expertise and experience in planning worked on Riley LAP. This work was done for over 2.5 years, with extensive engagement of the community and developers, in order to reach the right balance **for this area**. The Riley LAP left all sides somewhat disappointed, so objectively it was a good plan. After all this work, sending it back to Administration on Oct 29<sup>th</sup> should only have been done with **good** reason. The Councillors' preconceived notions of what was or was not enough density, without more, was **not** a good reason. **Administration recommended that the LAP be approved by Council and absent a good reason, it should have been.**

The referral directed Administration to "prioritize greater density around TOD sites". City planners had already **surely** prioritized density when working on the Oct 16<sup>th</sup> Riley LAP. The referral, really, was to **increase** density, and that's exactly what happened. The increase wasn't a "tweak" either, it was substantial. Are we to believe that the City planners **really** missed **so many appropriate** opportunities to increase density, in the Oct 16<sup>th</sup> LAP? **Of course they didn't.**

**The substantial density added in the revised Riley LAP was not appropriate, and I suggest that it was done to appease Council.** Density increases of this magnitude in **established neighbourhoods** cannot be the result of hasty and secretive decisions.

The revised Riley LAP adds large swaths of Neighbourhood Connector areas. These areas will really change our community because they extend **far into** established, low-density residential areas. Moreover, at least one area (see below), and likely the others, don't fit the definition of Neighbourhood Connector in the LAP which is: "characterized by a broad range of housing types along **higher activity** predominantly residential streets."

The four-block Neighbourhood Connector area designated between 14<sup>th</sup> and 16<sup>th</sup> Avenues in Briar Hill doesn't meet the definition. It is bounded at the north end by a high Wall that separates it from 16<sup>th</sup> Ave and a **one-way** egress road that exits onto 16<sup>th</sup> Ave at 20a street. The exit is dangerous and barely used, as cars need to merge from a full stop into 3 heavy lanes of rapidly moving traffic. Also, it is not possible to turn **into** Briar Hill from 16<sup>th</sup> Ave – cars have to go via 19<sup>th</sup> St to gain access.

The City has severely restricted access to and from 16<sup>th</sup> Ave here for good reason. The traffic is heavy and fast, coming from the TransCanada Highway and Crowchild Trail. And it will only get more busy with time. There will never be pedestrian traffic along this stretch of 16<sup>th</sup> Ave. It would be suicidal.

The streets in this four block area are probably the **quietest** streets in Briar Hill. They are on the edge of the neighbourhood and bounded by a Wall. For all practical purposes they're dead-end streets used

only by residents living on them. **This area is NOT properly designated a Neighbourhood Connector area as evidenced by the fact that it was not so identified in the Oct 16<sup>th</sup> Riley LAP.**

Section 638(2) of the MGA states that “an area redevelopment plan **must** be consistent with: (b) any municipal development plan.” Under the 2020 MDP, the following policies apply to an Inner City Developmental Residential Area:

(3.5.1) “Recognize the predominantly low density residential nature of Developed Residential Areas and support retention of housing stock or moderate intensification in a form and nature that **respects the scale and character of the neighbourhood.**”

(3.5.2) “Sites with the Inner City Area **may** intensify.....**if the intensification is consistent and compatible with the existing character of the neighbourhood.**”

See also sections 2.2.2, 2.2.5, and 2.3.2 of the MDP.

HH-BH is a low-density single-family residential neighbourhood. It has **always** had a lower density than the surrounding neighbourhoods of Banff Trail, Sunnyside and (West)Hillhurst because infills and secondary suites have been permitted in those neighbourhoods for decades. But **not** in HH-BH. This low density is the reason that many people choose to live in HH-BH and not in surrounding neighbourhoods, even though these neighbourhoods offer easy access to transit and comparable inner-city amenities. This lower density gives HH-BH its **special character.**

The revised Riley LAP increases density in HH-BH so that it is now similar to or even greater than in adjacent neighbourhoods. It therefore doesn't respect and is incompatible with the **existing character** of HH-BH. Development plans should support a broad range and mix of **neighbourhoods** - it is a **good** thing to have lower density and higher density inner city neighbourhoods.

Adding Neighbourhood Connector designations into the heart of HH-BH will enable the building of 4- and 6-storey buildings **directly adjacent to** bungalows and other single family homes. This creates dramatic contrasts in the physical development pattern of the neighbourhood, contrary to the MDP.

**The revised Riley LAP contravenes provisions of the currently in force 2020 MDP. It cannot be approved by Council as it does not comply with section 638(2) of the MGA which states that “an area redevelopment plan must be consistent with: (b) any municipal development plan.”**

H-CG zoning **alone** is going to **profoundly** increase density of HH-BH. For example, in my block having only bungalows, there are two pending Development Applications, one for a 12-unit (6 up/6 down) townhouse complex and one for an 8-unit (4 up/4 down) rowhouse. If these go through, that will be 20 living units where there used to be two (2). And that is just the start. **Additional increases in the density of HH-BH** should be done where it makes sense to, and that is, near transit zones, along busy streets, and in plazas and malls already here (as in the Oct. 16<sup>th</sup> Riley LAP).

Finally, I lived in Dalhousie from 2001 to 2019 and took the LRT downtown to work for 18 years. I saw that by the time the train got to Briar Hill or Sunnyside it was packed full and often people could not get on at all. This was worse in winter. Getting home in rush hour was a nightmare.

The lack of capacity was alleviated when 4-car trains started running. Upgrading to 4-car trains took 10 years and 400 million dollars, it is said. And it still isn't done. Customers are complaining about the lack of 4-car trains again, now that ridership has rebounded after Covid.

The **next** increase in LRT capacity to 5-car trains on the **NW Red Line** is apparently going to require some platforms to be lengthened **and** separation of the Red and Blue Lines in the downtown core. It will probably take a lot longer than the 4-car conversion. **After that, the Red Line will have no more capacity for growth (everything I've read says 5 cars is the maximum length for LRT trains).**

I was unable to find information projecting how long it might be until the NW Red Line needs to be upgraded to 5-car trains (there are some old reports from 2005/2006). As a rough estimate, since the LRT started in 1981 and now needs 4 car trains, let's say one additional car is needed every 10 years. That's **without** TOD. Calgary Transit's **30-year** Strategic Plan, RouteAhead, does **not** contemplate upgrading to 5-cars at all (the 8<sup>th</sup> Ave tunnel is deferred).

Given the increases in density proposed around **all three** LRT stations in the Riley LAP, given that people will be bused in from BRT, given that density is being added along the whole of the NW Red Line, and given the city-wide H-CG rezoning, it probably won't even be 10 years until 5-car trains are needed.

While TOD is a good thing, it's not foolproof. Steps must be taken to ensure that increases in transit capacity and residential development occur in tandem. TOD has failed Seton, where access to adequate transit hasn't materialized and condos in the resale market are more likely to sell below listing price if they have only one parking stall. And Glenmore Landing has a BRT stop used at only 30% it's capacity, while Council deliberates over how to increase density here.

**The NW Red Line is the linchpin for successful TOD in the Riley LAP and it's capacity is not unlimited. Caution is called for.** The density in the Riley area should be increased at a rate which ensures that the capacity of the NW Red Line can keep up with the demand or else Riley communities will be left with a lot of buildings that have been designed and built on a failed premise.

**Don't put the cart before the horse. Because it is less aggressive with respect to density, the Oct 16<sup>th</sup> Riley LAP is the better plan.**

Thanks for reading this.

Susan Rancourt  
1528 21 St NW, Calgary

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First name [required]

Kim

Last name [required]

Johnston

How do you wish to attend?

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What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments included in motion being presented by Councillor Wong.

AS A RESIDENT OF BRIAR HILL, I DO NOT SUPPORT THE INCLUSION OF HOUNDSFIELD HEIGHTS AND BRIAR HILL IN THE RILEY LOCAL AREA PLAN REPLACING THE HH-BH AREA REDEVELOPMENT PLAN, AND I DO NOT SUPPORT THE APPROVAL OF THE RILEY LOCAL AREA PLAN AS PROPOSED IN THE DECEMBER 2024 VERSION (LINKED BELOW).

THE MAIN REASON FOR MY OPPOSITION, IS THAT THE RILEY LOCAL AREA PLAN DOES NOT CONSIDER THE SAFETY OF AREA RESIDENTS.

If City Council approves this plan with the "Building Scale" as proposed, it creates an increased fire hazard which puts area residents at increased risk for loss of life and property. As minimum, city council needs to produce local area plans that are backed by the appropriate planning of the area infrastructure that would be required to underpin the proposal.

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

It is an admirable goal to add low-cost density housing near transit stations, but it has to be done in a way that is measured and appropriate, and in a way that respects area infrastructure and how the cumulative changes overtime will impact the community. Otherwise it is not a plan, it's a concept which should not be used as a tool for the approval of land changes including development and building permits.

The Building Scale Map updates from October 2024 to December 2024, have an alarmingly high increase in the number of locations where large storey buildings are being proposed. City Council needs to recognize that this plan is not feasible in its entirety, as it can not adequately supply the communities named in the Riley Local Area Plan with water, electricity, and the increased fire and police response protection required without extensive upgrades and investment.

My recommendation to City Council is that instead of creating Local Areas Plans that aren't backed on anything other than desire, roll up your sleeves and put together an actual proposal to build affordable housing in these communities that respects infrastructure and the safety of area residents. The completion of a handful of actual projects that are affordable and work within the existing communities is more valuable than a vision that is not underpinned by a complete and fulsome plan of how it can be achieved, especially if it does not account for the safety of resident Calgarians.



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## ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required] david

Last name [required] todd

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters riley communities local area development plan

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The Riley Local Area Development plan has been the subject of many communication sessions, community input processes and consultation workshops. We've seen iterations of the plan with precious few revisions that reflected the views of most residents. The most recent revision, the one that is intended to be presented to council is astounding in its audacity to not only continue to ignore the previous feedbacks, but to present an even more egregious encroachment of high density zoning in the form of 12 story structures that had previously not been considered. That some of us have spent many hours participating in a consultation process that we had assumed was being conducted in good faith only to have the final proposal reflect something drastically different is offensive, unethical and perhaps fraudulent.

The current proposal does not modestly revise and densify, it drastically changes the character of the neighborhood. Some of us, maybe most of us, selected this neighborhood because of its single family character, an enchanting mix of historical and modern homes and what we thought was a protective zoning to ensure our "forever home" would retain the very attributes that underpinned our investment decision.

In our case, our address being 1302 15th St NW, the new plan permits a 12 story apartment complex directly across the street, obliterating our view, creating untold traffic concerns, shadowing our gardens thus destroying the gardening pleasure we currently enjoy, and destroying any sense of home privacy. The impact on our home value would be significant.

I've participated in the consultation process and have provided feedback that the previous plan, permitting 4 story structure adjacent to our home, was also problematic for some of the same concerns. That input clearly had no impact. The new proposal is NOT what had been previously considered and was NOT the subject of previous consultations.

I respectfully ask that this proposal be withdrawn.

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First name [required]

Peter

Last name [required]

Skirving

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Standing Policy Committee on Infrastructure and Planning

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Draft Riley DAP

Are you in favour or opposition of the issue? [required]

Neither



ATTACHMENT\_01\_FILENAME

Council Comments March 2025.docx

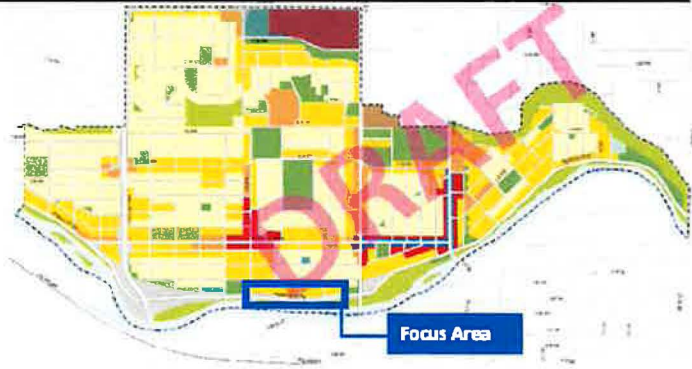
ATTACHMENT\_02\_FILENAME

Comments - please refrain from  
providing personal information in  
this field (maximum 2500  
characters)



## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



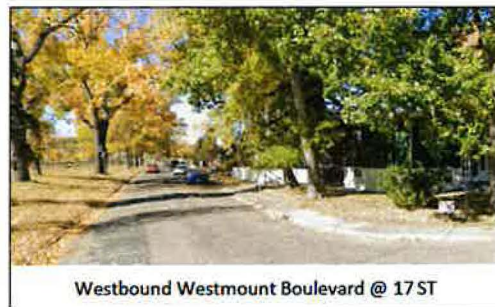
### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

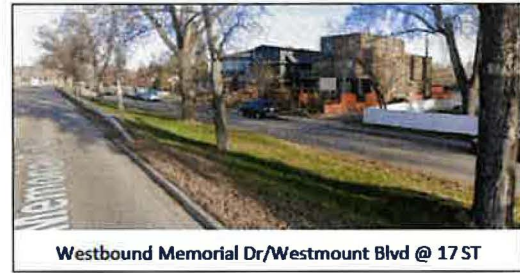
#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
  - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



Westbound Memorial Dr/Westmount Blvd @ 17 ST

- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



Eastbound Memorial Drive @ 14 ST NW – lane closure infrastructure

- downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**

- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



No space for a pedestrian overpass at this location

- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.



- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### **1. Substantial written and in-person feedback was not recorded and not considered in this Plan.**

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. *They considered this a petition and dismissed the substantial feedback from 18 households.* For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.

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First name [required] Amy

Last name [required] Atkinson

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required] Neither



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

**Riley Park LAP feedback**

In consideration of the redevelopment of 19th Street as part of the Riley Park LAP, the plan should be revised to reflect the specific physical characteristics of the 400 and 500 blocks of 19th Street NW. These blocks lack alleyways and have shallower lot depths than other areas, which limits their capacity to accommodate large-scale four-storey developments without significant site access and compatibility challenges.

To ensure appropriate scale and integration within the existing urban fabric, the plan should establish clear guidelines, such as height and density limitations, for future developments on these blocks. This will provide clarity to developers and ensure that new projects align with the constraints of the site.

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First name [required] Alisha

Last name [required] Bhura

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP: 7.3.2

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Council Comments March 2025.pdf

I am strongly opposed to Policy 2.5.2.1 (d) which requires new development on properties on the north side of Westmount Road NW to back onto the residential road and front Kensington Road. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone and is harmful to the current residents in the area. As a homeowner on Westmount Road I find it disrespectful the City is considering such a major change with no consideration for property values and the strong sense of community built in the area. There are better ways to create a pedestrian environment without impacting our existing community. Respecting the historical neighborhood layout is critical to maintaining our strong sense of community and respecting property values in the area.

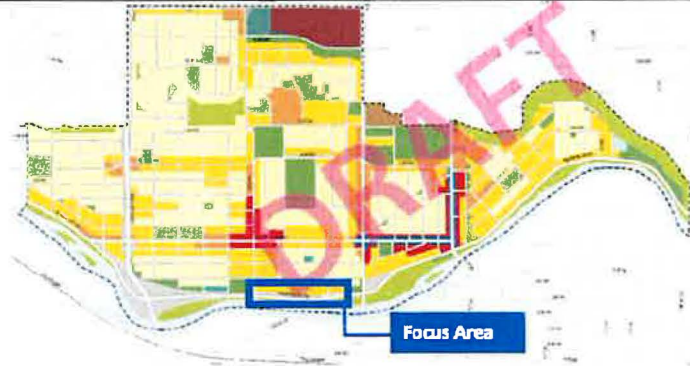
Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Furthermore:

- 1) There is known creosote contamination in area proximate to Westmount Boulevard and Broadview Road between 19th and 14th Ave NW.
- 2) There is no specific policy in place to guide development proximate to creosote contamination and a very disjointed process between the city and the province for handling contamination in urban areas.
- 3) The Riley LAP does not mention or consider this underlying condition in any manner and therefore ignores important development constraints for areas effected by contamination.
- 4) Conversation with both the City and Province regarding contamination in the area have left residents feeling concerned that both levels of government are not taking the residents health and tax payer liability risks seriously. Furthermore City administration are confused and or are not forthright in sharing information with concerned citizens.
- 5) The Riley LAP should not be accepted by council until these creosote contamination concerns are properly addressed, the health and liability risks are understood and communicated to community members, and the development constraints are accurately reflect within the LAP document.

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



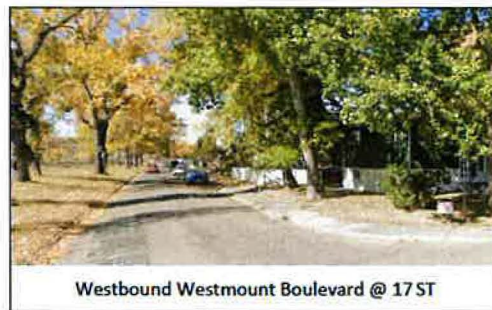
### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
  - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
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- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
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- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



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- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
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- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
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- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
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Creosote Facility @ Pumphouse Park

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Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.

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First name [required] Omar

Last name [required] Rashid

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP: 7.3.2

Are you in favour or opposition of the issue? [required] In opposition



ATTACHMENT\_01\_FILENAME

Council Comments March 2025.pdf

ATTACHMENT\_02\_FILENAME

I am strongly opposed to Policy 2.5.2.1 (d) which requires new development on properties on the north side of Westmount Road NW to back onto the residential road and front Kensington Road. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone and is harmful to the current residents in the area. As a homeowner on Westmount Road I find it disrespectful the City is considering such a major change with no consideration for property values and the strong sense of community built in the area. There are better ways to create a pedestrian environment without impacting our existing community. Respecting the historical neighborhood layout is critical to maintaining our strong sense of community and respecting property values in the area.

Comments - please refrain from providing personal information in this field (maximum 2500 characters.)

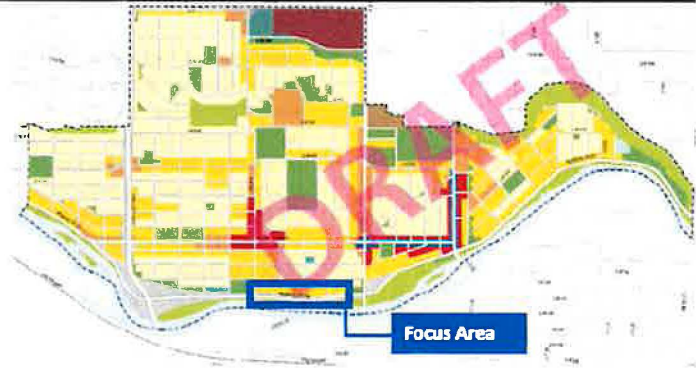
Furthermore:

- 1) There is known creosote contamination in area proximate to Westmount Boulevard and Broadview Road between 19th and 14th Ave NW.
- 2) There is no specific policy in place to guide development proximate to creosote contamination and a very disjointed process between the city and the province for handling contamination in urban areas.
- 3) The Riley LAP does not mention or consider this underlying condition in any manner and therefore ignores important development constraints for areas effected by contamination.
- 4) Conversation with both the City and Province regarding contamination in the area have left residents feeling concerned that both levels of government are not taking the residents health and tax payer liability risks seriously. Furthermore City administration are confused and or are not forthright in sharing information with concerned citizens.
- 5) The Riley LAP should not be accepted by council until these creosote contamination concerns are properly addressed, the health and liability risks are understood and communicated to community members, and the development constraints are accurately reflected within the LAP document.



## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

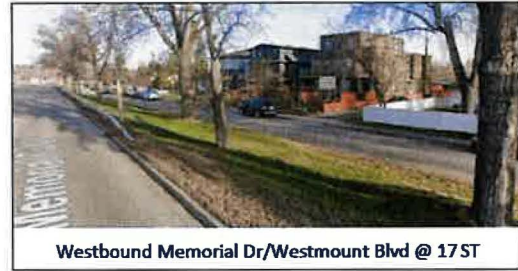
#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:

- This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.



- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



Westbound Memorial Dr/Westmount Blvd @ 17 ST

- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



Eastbound Memorial Drive @ 14 ST NW – lane closure infrastructure

- downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.**
- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



No space for a pedestrian overpass at this location

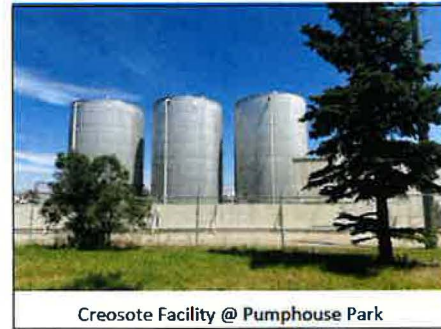


- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.

- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households***. For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.





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ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required]

Ken

Last name [required]

Kittlitz

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Item 7.3.2: Riley Communities Local Area Plan

Are you in favour or opposition of the issue? [required]

In opposition



## Public Submission

CC 968 (R2024-05)

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ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I wanted to register my concern about the final draft of the Riley Local Area Plan, which has changed markedly since the draft presented in May, 2024. The final draft allows for significantly more density than did the May draft, and has not been subject to adequate engagement with the community. Because of this lack of engagement, I do not think this draft should be approved by Council. Further discussions and negotiations with the affected communities should be required before any draft is approved. Thank you.

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First name [required] Naheera

Last name [required] Jadavji

How do you wish to attend?

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What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP: 7.3.2

Are you in favour or opposition of the issue? [required] In opposition

ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

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Furthermore:

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First name [required]	Mika
Last name [required]	Kato
How do you wish to attend?	
You may bring a support person should you require language or translator services. Do you plan on bringing a support person?	
What meeting do you wish to comment on? [required]	Council
Date of meeting [required]	Mar 4, 2025
What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published <a href="#">here</a> .)	
[required] - max 75 characters	Riley LAP 7.3.2
Are you in favour or opposition of the issue? [required]	In opposition





ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I am strongly opposed to Policy 2.5.2.1 (d) which requires new development on properties on the north side of Westmount Road NW to back onto the residential road and front Kensington Road. All homes on the north side of Westmount Rd NW should face Westmount Rd and garages should be built in the front of the home. This ensures that the Westmount Rd residents would all face each other to preserve a sense of community and not negatively compromise the curb appeal as well as the property value of homes located on Westmount Rd NW. Any development of lands with known creosote contamination near Westmount Boulevard and Broadview Road between 19th and 14th Ave NW should require thorough clean up/remediation prior to any redevelopment. Public health/resident health, water table safety should always supersede any redevelopment/profit motive of developers. The City of Calgary should act ethically and draft a thorough policy on remediation of relevant contaminants before any land redevelopment is approved.

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First name [required] **Barbara**

Last name [required] **Vigar**

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] **Council**

Date of meeting [required] **Mar 4, 2025**

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] – max 75 characters **Riley Communities Local Area Plan Referral, IP2025-0009**

Are you in favour or opposition of the issue? [required] **In opposition**

ATTACHMENT\_01\_FILENAME

Hounsfield Heights - Briar Hill Community Association - Riley LAP March 4 council public hearing - final.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I want to lend my support for the submission by Elizabeth Atkinson on behalf of the HH-BH Community Association attached above. I find it disgusting that the City is totally disregarding input from the community and totally siding with activists and developers. You appear to have shown a total lack of respect for input from the community. Activists and developers should not have a vote as to what happens in our community, it should ONLY be the community you are listening to for decisions about our community. If the activists want more density, let them have it in their own neighbourhoods. And there are lots of other areas where developers are and can develop than in neighbourhoods with previous R1 development. You talk about wanting to give people more housing choices but you are taking away the choice for people to have a neighbourhood with single family dwellings, to have privacy, sunlight, retaining their community context.

You appear to be in such a rush to put up housing that you are not giving consideration to people who already live here. And in your rush, you are also not considering the impact of your decisions. For example, you should be evaluating the infrastructure in our community to see if it can handle all of the extra building before you push all of this extra density.

I believe you should begin listening to what the community wants. The HH-BH Community Association has put a lot of thought into what will preserve our community while also allowing for increased density. They have actually listened to the community. Your engagement process is a sham. You are attempting to rush this through, doing what you want without regard to the outcome. If this is a vision for the next 30 years, I think you can take more time to evaluate the outcome of some of the things you are doing and want to do.



February 24, 2025

**To the Mayor and City Council, regarding opposition to the revised Riley LAP**

The community of Hounsfield Heights – Briar Hill has been engaging in the Riley Local Area Plan process in good faith for well over two years now, and have been explaining to the Riley planning team what we love about our community, and our ideas for reasonable compromise and good mitigations to add density whilst maintaining our community character and cohesion. On October 16 we presented our concerns about the Riley LAP draft, that the very strong majority of community members feel that the Phase 4 Riley proposal, particularly 6 storey apartments where single-family are now located, is already too much contrast with the existing community character, and is not a reasonable compromise. We remind council that there is a lot of room for very high density on the North Hill Mall site and Louise Riley site, and this should be balanced with respect for our established community. Our key concerns are loss of sunlight and privacy, loss of tree canopy and wildlife, and loss of the architectural character of the community, and practical issues such as infrastructure, traffic and parking problems.

We were truly dismayed by the response that some presenters and councillors think we are not being damaged enough. IPC referred the Riley LAP back to City Administration for yet more density in our community, and to incorporate mobility into the LAP better. We wrote to all of council outlining our objection to further density in the core community, and drawing many quotes from the Municipal Development Plan and Transit Oriented Development principles to support this stance. For example, **the MDP says “ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern”**, and **TOD states “each station exists in a particular community context. Development should complement the existing development and help to enhance the local character”** (see Appendix A below for many more quotes). We were even more demoralized when the motion to refer passed unanimously, with the first clause directing Administration to add yet more density. We do understand some councillors had other motives for this referral, but of course, the Riley Team did what the motion said...

The motion gave the Riley Team all of the first quarter to do this revision, but they did it in just over a month, quickly and without any engagement with communities, working group members, or the public. They did discuss issues with developers at this time, however, displaying an inappropriate bias. They informed the community of their plan right before the holidays, neither seeking feedback nor incorporating concerns. Instead, the plan was rushed back to council. The changes included:

- 12 storey apartments in eastern Hounsfield Heights in an area of single-family homes on top of a significant hill, with very poor vehicular access/egress. This area also has the Sears gas plume beneath it, making it unsuitable for large excavations, The City seems only interested in the 600 m distance to LRT, not these practicalities or the current context.
- A large area of Briar Hill has been changed to 6 and 4 storey apartments, including in some blocks also with poor egress. This is a very significant increase in density over a significant area, and community members now seriously affected want and should have a chance to know about it and have input.



- 4 storeys covers the majority of Hounsfield Heights now, again a significant increase from the Phase 4 maps, with no engagement.
- 6 storeys has been added along 19<sup>th</sup> Street and 18A Street and near Green Park, and 12 storeys on the church site, all higher than tree canopy and very much out of scale with the currently predominant bungalows.
- Neighbourhood Connector covers about half of the community, even though most of the community is quiet streets with limited infrastructure.

Basically, we've now got to the map the City and developers want. There's no incorporation of the feedback of citizens actually affected, so what were the last couple of years of effort even for? There is no analysis of infrastructure capacity, traffic and parking with this much increase, nor consideration of shadowing, privacy, loss of trees and wildlife, or loss of community character from this much change.

Further, the second clause of the referral motion directed Administration to better address mobility aspects, and several speakers in October commented that the Mobility Study was not well incorporated into the LAP. However, the revised LAP does not appear to make significant changes to address this second clause. The only interesting change in our area is the promotion of "a direct and accessible pedestrian and cycling connection from the Riley Park Village to the SAIT... LRT" and "a grade separated crossing north of 10<sup>th</sup> Ave NW across 14 Street NW". These ideas more support the bigger built forms the City hopes to see on 14<sup>th</sup> Street, rather than supporting pedestrian flow from our community to downtown and from Hillhurst to North Hill Centre, that we have raised. We have suggested a crossing closer to 8<sup>th</sup> Ave to best facilitate pedestrian routes; to meet both goals, the crossing would need to be no further north than 10<sup>th</sup> Ave.

At IPC in January several Riley community members continued to present their concerns about the plan, for HH-BH, West Hillhurst and Hillhurst. We particularly expressed the issues with the total lack of engagement about the most recent changes. At the same time, developers spoke to express their pleasure with concession made addressing their concerns, and activists from outside our community appeared pleased as well. Despite this, a councillor described this as "balanced" and erroneously (and inappropriately) dismissed the communities' opinions with "nothing would make them happy". This is false and not a reasonable characterization of our stance all along – the key change we were looking for in October was backing off from 6 storey right beside bungalows, not "no change". A more 'balanced' plan, in that no-one was actually happy, was the plan presented in October. We have since learned that the City Administration also saw that October plan as balanced between stakeholders. We need to at least get back to that real 'balance'.

Finally, we have throughout the process suggested some simple but important ideas to mitigate the effects of density in our community, and they've been ignored.

- For example, INDOOR access to shopping is a very important amenity for seniors and disabled people living in the Renaissance Towers. We were able to get "account for winter design principles and ensure convenient pedestrian movement between buildings during all seasons", but we can't get to INDOOR – why not? Anything but indoor would be a huge loss and a huge difference, and we are not dictating how (plus 15, mall, underground...).
- Our second idea is that in the (rather common) case of a developer wanting to put two narrower dwellings where there is now one (typically splitting a 50ft lot), we strongly prefer well designed semi-detached built forms. They can be designed to blend in with the existing homes whilst still adding density, whereas narrow infills stand out and would significantly detract from the community character... But our idea has been dismissed. Lots of other specific policies are in the LAP, but not what the community asks for.



Right now this Local Area Plan has very little local in it, very very little for the local residents affected, 0% us, 100% developer flexibility. City Administration has told us these ideas are 'not in scope' and we can discuss these at the Development Permit stage – but they know as well as we do that these ideas MUST be in the statute, or we will have NO means to insist on them being followed. We can say we prefer semi-detached, for example, but the developers can say no, and the file managers or SDAB would have no basis, guidance or requirement to listen to our ideas or preferences. Please show us that this is a representative democracy, by at the very least putting in some amendments to insert these simple mitigations (see second Appendix B below).

The city needs to actually LISTEN to engagement, and people actually affected by policies should be afforded more say in their communities. Citizens deserve actual consultation and honest compromise, not 100% developer and activist priorities. The Engagement process for Riley LAP did not reveal the City's ideas for our community until late in the process (see Appendix C), and the latest revisions have not been at all properly communicated. The strong majority opinions of the residents of Hounsfield Heights – Briar Hill have been unheeded. The concerns about the Mobility Study and its lack of good integration into the LAP are very valid, and mobility concerns should be better addressed.

Thus, we ask council to:

- Return to the Riley LAP plan as presented to IPC in October 2024
- Pass amendments to mitigate the effects of density on our community's unique character:
  - o Incorporate INDOOR access between residences and shopping in the North Hill Centre plan
  - o Prefer semi-detached built forms that blend-in when replacing one unit with two.

We ask council to follow the policies and principles of the MDP, TOD, and Guide for Local Area Planning – acknowledge context, respect for existing character, shadowing and massing impacts. Acknowledge the needs of the people who have already committed much of their lives to this community, as well as future residents who will appreciate our unique community. We cannot get in a time machine and pick a different community into which to invest our hearts and hard work – we are here and we matter too. We ask council to revise this plan further to a respectful COMPROMISE.

Beth Atkinson, Director – Land-Use  
Hounsfield Heights – Briar Hill Community Association,  
[land.use@hh-bh.ca](mailto:land.use@hh-bh.ca)

### **Appendix A – Municipal Development Plan, Transit Oriented Development Guidelines and Guide for Local Area Planning concepts, ignored by Riley LAP:**

At the Oct.16 IPC meeting, the idea of principles for Transit Oriented Development were raised. The full planning area under TOD is up to 600 m from the LRT stations, but this is only one consideration. The LRT stations were not built before the communities – there were already vibrant existing communities there, some very close to the platforms. Thus, the Municipal Development Plan, TOD Guidelines and Implementation Strategy, and the Guide for Local Area planning all address, in great detail, the idea of respecting the existing communities, complementing their character, and developing in context:

#### **Municipal Development Plan**

"Design must also recognize local context and create urban environment that support and integrate new development with existing communities." (sec. 2.2.2)

"Intensification should be accommodated within existing communities in a sensitive manner." (sec. 2.2.5)

"Respect the existing character of low-density residential areas, while still allowing innovative and creative designs that foster distinctiveness... Ensure infill development complements the established character of the area and does not create dramatic contrasts in

the physical development pattern. Ensure that the preparation of local area plans includes community engagement early in the decision-making process that identifies and addresses local character, community needs and appropriate development transitions with existing neighbourhoods." (sec. 2.3.2)

"Recognize the predominantly low-density residential nature of Developed Residential Areas and support retention of housing stock, or moderate intensification in a form and nature that respects the scale and character of the neighbourhood." (sec.3.5.1)

"Buildings should maximize front door access to the street." (sec. 3.5.2)

#### **TOD Guidelines and Implementation Strategy**

"TOD Guidelines – Work with local communities. Built form should complement the local context"

"These TOD Policy Guidelines will respect existing stable communities."

"Station Planning Area... is a 600 m radius... important, this radius may be reduced where existing stable residential communities exist around existing stations."

"Each station exists in a particular community context. Development should complement the existing development and help to enhance the local character".

"Ensure that building massing and shadowing impacts are minimized."

"Sensitive interface adjacent to existing residential."

"The process of planning TOD in communities can provide The City and developers with a better understanding of what is important to residents and businesses experiencing growth and change"

"Development around transit stations can contribute to placemaking"

#### **Guide for Local Area Planning**

"A local area plan supports communities experiencing redevelopment by outlining... a future land use concept for where and how new development can be integrated into the neighbourhood over time in a way that respects and enhances the existing context of the area."

"Community vibrancy is maintained by ensuring new development contributes to community identity and respects historic resources."

"Support the use of existing streets, services and buildings to reduce the need for new infrastructure."

"At all scales, redevelopment should consider existing context, parcel layout, building massing, and landscaping to sensitively integrate in the community."

"Retain existing healthy public (and private) trees and landscaping on, or adjacent to, development sites."

We need to follow these principles, not just the idea of density within a certain distance from a station, or 'making more use of the LRT'. We need our city to RESPECT residents and the established communities we've invested our lives in, often for decades, where we've put our heart and soul into our forever homes.

**Based on these principles of context and respect, LAPs SHOULD COMPROMISE in the communities adjacent to the LRTs, not act like those communities don't exist.**

Note we are asking for respectful compromise, and mitigations of the impact of density on character, NOT no change. The MDP does state that "respecting neighbourhood character does not mean preventing change", and we acknowledge that. However, the contrast of 6 storeys with bungalows is significant. And 12 storeys replacing what were single-family homes on quiet streets is just NOT RESPECT. We need some acknowledgement of our concerns for shadowing, privacy, parking and traffic issues, high lot coverage, and loss of tree canopy, greenery and wildlife, that come from this very excessive contrast. 12 storeys, especially, just can NOT be considered in context with or complementary to what are currently single-family communities!

And this is not a case about equity at all. Everyone's forever homes matter, whether they are modest communities or more upscale, whether they are in Hounsfield Heights, Banff Trail, Whitehorn, Martindale, or other communities near the LRT and BRT lines that do not yet have an LAP. All of these communities abut the LRT lines directly, and no-one in these communities bought expecting their communities to be fundamentally ripped out and replaced with significantly tall apartments. At some other LRT stations in existing LAP's, 6 storey apartments are mapped over parking lots, industrial or commercial land, not quiet residential streets – this is more appropriate.

#### **Appendix B – Amendments to incorporate HH-BH Local concerns into this Local Area Plan:**

INDOOR ACCESS: Amend section 2.2.4.1 part g to say "Development should account for winter design principles and ensure convenient INDOOR pedestrian movement between buildings during all seasons."

SEMI-DETACHED BUILT FORM: Add section 2.5.7 Community Character policies section 2.5.7.1



Hounsfield Heights – Briar Hill contextual built form: The core areas of Hounsfield Heights and Briar Hill historically had single family (RC-1) zoning with consistent wide lot and dwelling widths. To respect this community character, even as greater density is added to the community, subdivision of lots that were historically RC-1 to lots narrower than 12 m should use semi-detached or duplex built forms, to use good design to fit into context with the width proportions of surrounding dwellings. Built forms with widths less than 9.5 m, such as narrow single family dwellings, are strongly discouraged, especially for standard lots with lanes. Redevelopments of all scales should have façade articulation, and a variety of quality finishing materials.

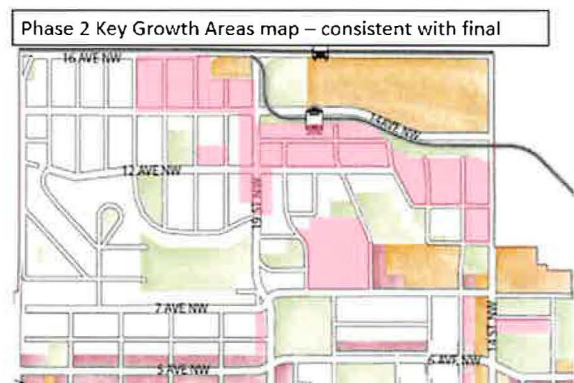
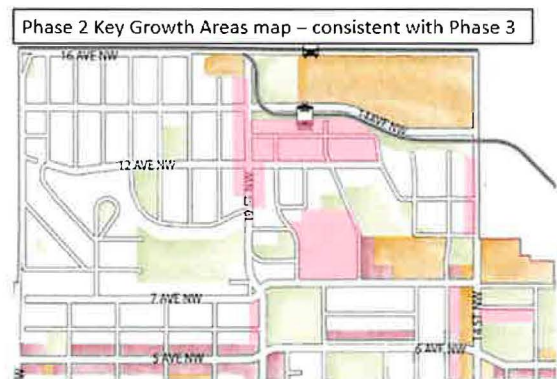
Note that Councillor Wong's Ward 7 staff are working on version of these and other amendments, and may have better wording. They are also reviewing with other Riley communities if there are missed community specific mitigations and policies that they were seeking. **It is an important point that council has chosen to bring TWO LAP's from Ward 7 to public hearing on March 4 – this is not a fair burden of work on the staff of Ward 7, nor a fair hearing for these key plans.**

### Appendix C – Communication of Key Growth to the community over time

As explained above, engagement with the community and citizens affected by these policies over time has been very disappointing. To make this point, here is the map of 'Key Growth' (4 or more storeys) for our community. At Phase 2, the actually published map shows almost no 'key growth'. Major changes to the plan were made for Phases 3, but booklets were delivered late and citizens had only two weeks to comment before the initial deadline. These changes were based on city policies and should have been known and illustrated at Phase 2 – the 'key growth' map consistent with Phase 3 is shown, and a Phase 2 map with no 'key growth' does not appear defensible. Phase 4 kept a similar level of 'key growth' and moved some areas around. But the final December 2024 revision was about DOUBLE the 'key growth'. The final map is NOT a balanced plan that in any way respects the existing community, but it wasn't even circulated (as key growth or building scale). Neither the first map with no information on the City's goals, nor the lack of engagement on the final map, engender trust from the affected communities.

## Growth of impact throughout

- Phase 2, almost no key growth
- Phase 3, significant change but CA not allowed to publicize, limited time to comment
- Final, NO engagement, another very significant increase in 'Key Growth', now almost half of the community





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First name [required] Jackie

Last name [required] Mootoo

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Council meeting - Public hearing

Are you in favour or opposition of the issue? [required] In opposition



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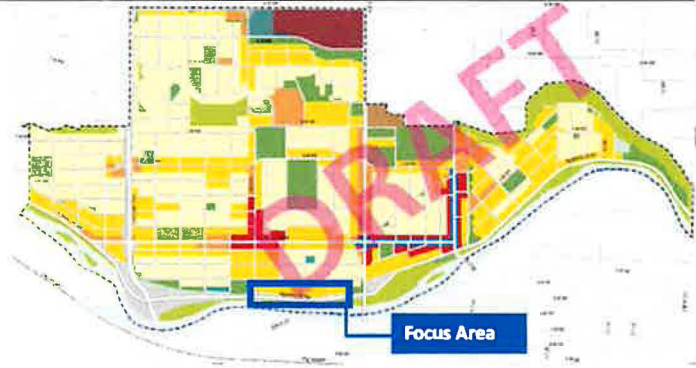
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Comments - please refrain from  
providing personal information in  
this field (maximum 2500  
characters)



## RE: RILEY LOCAL AREA PLAN COMMENTS

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### LAP PLAN AMENDMENTS:

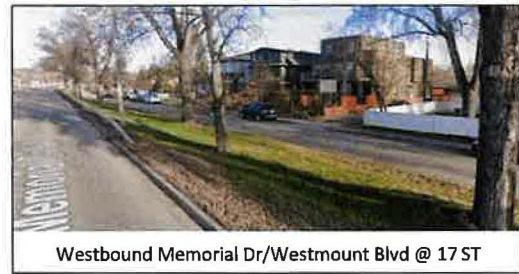
1. That the Westmount Boulevard area, as shown as “focus area” in the above map, be designated as Neighbourhood Local (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan include policy regarding development on contaminated sites that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That policy 2.5.2.1(d), which directs any new development along the north-side of Westmount Road to have the backyard face the established community, be removed.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local
  - The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
  - The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
    - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.



- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that respects the scale and character of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for modest intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



- downtown. City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible along this stretch of Memorial Drive, unless the lane reversal was to be removed.
- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



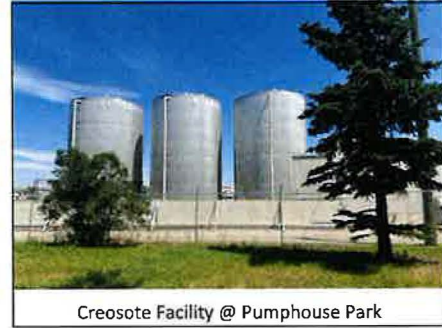
- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [The Regulation of Pollution and Contaminated Sites in Alberta](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a “lack of regulation for risk management through exposure control at contaminated sites in Alberta”. One of top seven recommendations stemming from the report include “Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments were not recorded in the What We Heard Report.



- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to back onto the residential road and front Kensington Road.
- This policy applies to nine residential blocks. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

1. Substantial written and in-person feedback was not recorded and not considered in this Plan.
  - Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. *They considered this a petition and dismissed the substantial feedback from 18 households*. For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



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First name [required] Paulina

Last name [required] Brittner

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required] Council

Date of meeting [required] Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters Riley LAP: 7.3.2

Are you in favour or opposition of the issue? [required] In opposition

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Council Comments March 2025.pdf

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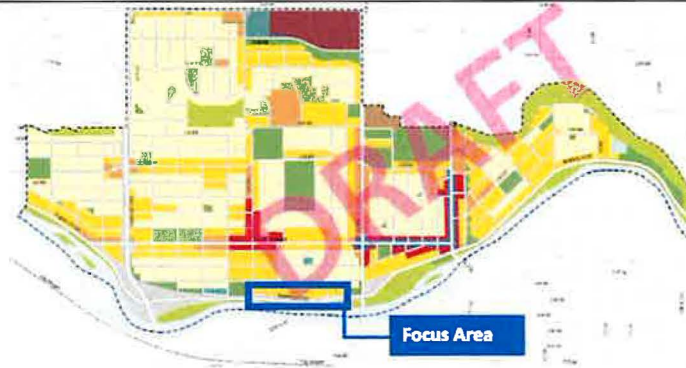
Furthermore:

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

- 1) There is known creosote contamination in area proximate to Westmount Boulevard and Broadview Road between 19th and 14th Ave NW.
- 2) There is no specific policy in place to guide development proximate to creosote contamination and a very disjointed process between the city and the province for handling contamination in urban areas.
- 3) The Riley LAP does not mention or consider this underlying condition in any manner and therefore ignores important development constraints for areas effected by contamination.
- 4) Conversation with both the City and Province regarding contamination in the area have left residents feeling concerned that both levels of government are not taking the residents health and tax payer liability risks seriously. Furthermore City administration are confused and or are not forthright in sharing information with concerned citizens.
- 5) The Riley LAP should not be accepted by council until these creosote contamination concerns are properly addressed, the health and liability risks are understood and communicated to community members, and the development constraints are accurately reflect within the LAP document.

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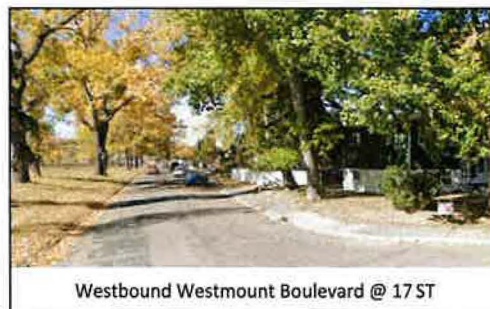
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Westbound Memorial Dr/Westmount Blvd @ 17 ST

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Eastbound Memorial Drive @ 14 ST NW – lane closure infrastructure

downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.

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No space for a pedestrian overpass at this location

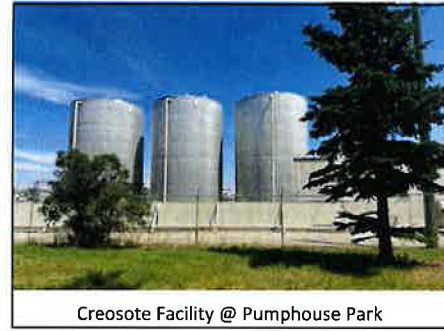
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- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.



Creosote Facility @ Pumphouse Park

- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.

- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.



---

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ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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First name [required]

Tom

Last name [required]

Hades

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Riley LAP: 7.3.2

Are you in favour or opposition of the issue? [required]

In opposition

ATTACHMENT\_01\_FILENAME

Council Comments March 2025.pdf

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I am strongly opposed to Policy 2.5.2.1 (d) which requires new development on properties on the north side of Westmount Road NW to back onto the residential road and front Kensington Road. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone and is harmful to the current residents in the area. As a homeowner on Westmount Road I find it disrespectful the City is considering such a major change with no consideration for property values and the strong sense of community built in the area. There are better ways to create a pedestrian environment without impacting our existing community. Respecting the historical neighborhood layout is critical to maintaining our strong sense of community and respecting property values in the area.

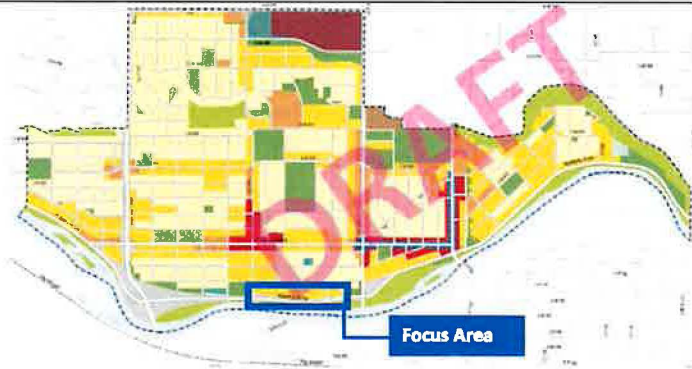
Furthermore:

- 1) There is known creosote contamination in area proximate to Westmount Boulevard and Broadview Road between 19th and 14th Ave NW.
- 2) There is no specific policy in place to guide development proximate to creosote contamination and a very disjointed process between the city and the province for handling contamination in urban areas.
- 3) The Riley LAP does not mention or consider this underlying condition in any manner and therefore ignores important development constraints for areas effected by contamination.
- 4) Conversation with both the City and Province regarding contamination in the area have left residents feeling concerned that both levels of government are not taking the residents health and tax payer liability risks seriously. Furthermore City administration are confused and or are not forthright in sharing information with concerned citizens.
- 5) The Riley LAP should not be accepted by council until these creosote contamination concerns are properly addressed, the health and liability risks are understood and communicated to community members, and the development constraints are accurately reflect within the LAP document.



## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



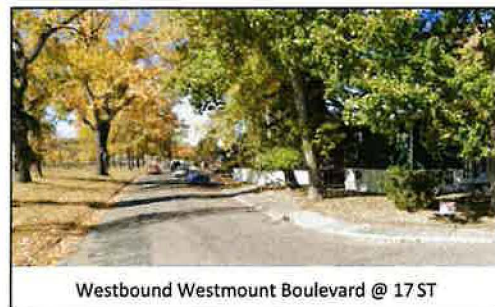
### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

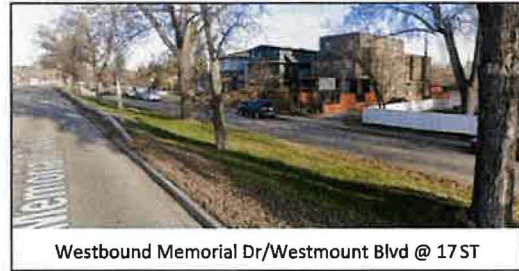
#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
  - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
- At each end of Westmount Boulevard there exists intersections that do not meet current code and cannot safely handle existing traffic.



Westbound Memorial Dr/Westmount Blvd @ 17 ST

- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



Eastbound Memorial Drive @ 14 ST NW – lane closure infrastructure

- downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.
- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.



No space for a pedestrian overpass at this location

- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

- The Westmount Boulevard area is impacted by creosote contamination, that if exposed, will impact the health and wellbeing of area residents. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.
- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
- Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability.
- Alberta Environment and Protected Areas has reinforced to area residents that The City is the responsible body for any development on contaminated lands, and that the Province is only an advisor. Neither level of government has engaged with the concerned residents despite repeated requests.
- Through the engagement process, area residents asked that the Plan consider the existing contamination to ensure the protection of public health and wellness in this area. There was no response to this feedback and the comments **were not recorded in the What We Heard Report**.



- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area**, which should be the role of City Administration as the regulatory body.
- Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.



Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

- Policy 2.5.2.1 (d) requires new development on properties on the north side of Westmount Road NW to **back onto the residential road** and front Kensington Road.
- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.

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First name [required]                      Conor

Last name [required]                      McGreish

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]                      Council

Date of meeting [required]                      Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters                      7.3.2 Riley Communities Local Area Plan Referral, IP2025-0009

Are you in favour or opposition of the issue? [required]                      In opposition



ATTACHMENT\_01\_FILENAME

ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

This is not necessarily in opposition entirely but I would like for council to seriously consider certain elements of the LAP before continuing since it is deficient in it's current iteration.

Most prominent oversight is that the plan include policy regarding development on contaminated sites that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety. The Plan does not address or take into context the unique planning considerations and appears to prioritize redevelopment over public health and safety.

Research undertaken by community members/ Professional Environmental Engineers, indicated that the City is not clear on the legal and Health, Safety and Environmental implications of contaminated sites, similar to the Lynnewood Ridge liability. There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk. Instead of placing inappropriate development pressures that are at odds with public health, we request that The City develop policy that focuses on reducing the city and taxpayers' long-term liabilities, especially as it relates to sites that have no qualifying 'responsible person' under the Environmental Protection and Enhancement Act.

Additionally, it is disheartening to see that substantial written and in-person feedback was not recorded and not considered in this plan. Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report,

Thanks you,  
Conor McGreish



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First name [required]

Neil

Last name [required]

Campbell

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to comment on? [required]

Council

Date of meeting [required]

Mar 4, 2025

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

[required] - max 75 characters

Anthem Development Land Use Amendment Risk Mgmt Approval

Are you in favour or opposition of the issue? [required]

In opposition

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ATTACHMENT\_01\_FILENAME

Council Comments for March 2025.pdf

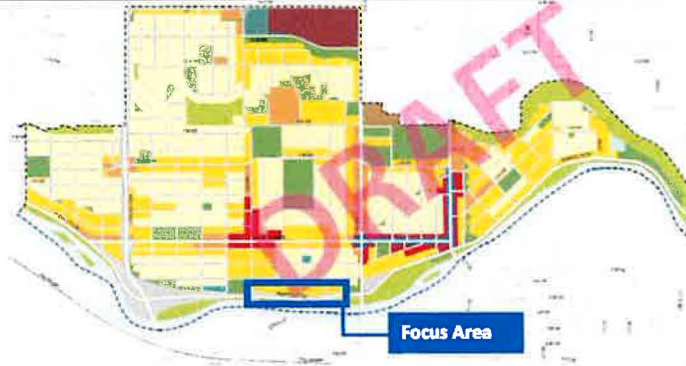
ATTACHMENT\_02\_FILENAME

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The original plan for the site from Anthem met the criteria for the property, this plan does not meet the listed requirements published by the City.

## RE: RILEY LOCAL AREA PLAN COMMENTS

Please find below our comments regarding the draft Riley Local Area Plan. Our comments focus on the Westmount area of the Plan as indicated in the adjacent map.



### LAP PLAN AMENDMENTS:

1. That the Westmount Boulevard area, as shown as “focus area” in the above map, **be designated as Neighbourhood Local** (and not Neighbourhood Collector as proposed) and that the proposed height be a maximum of “up-to 4 stories” (and not 6 stories as proposed).
2. That the Plan **include policy regarding development on contaminated sites** that addresses the current gap in approvals and monitoring for the Westmount Boulevard area to protect public health and safety.
3. That **policy 2.5.2.1(d)**, which directs any new development along the north-side of Westmount Road to have the backyard face the established community, **be removed**.

### EVIDENCE SUPPORTING REQUESTED AMENDMENTS:

#### 1. Requested Amendment #1: Designate the Westmount Boulevard area as Neighbourhood Local

- The Plan designates this area as a Neighbourhood Connector that will promote four to six storey development and retail and commercial uses in an area that is assessable by a one-way single-lane roadway and has existing contamination that limits subsurface disruption.
- The MDP encourages growth to happen around Main Streets, Transit Station Areas and Activity Centres – none of which applies to this area. City Planners have stated that the area’s proximity to Memorial Drive makes it a corridor, which justifies the higher densities and non-residential uses in this historically low-density area. What has not been considered is that:
  - This area is separated by a treed median and a significant grade differential, which differentiates from Memorial Drive.





- There is no existing or feasible access to the river pathway system from this location;
- There is no existing or planned transit to this area;
- Memorial Drive is a commuter roadway for non-local citywide traffic;
- There is limited to no existing pedestrian or bike activity along Westmount Boulevard;
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- The Municipal Development Plan does not support this development pattern. Policy 3.5.1 (a) speaks to importance of recognizing the predominately low-density residential nature of the developed area, while supporting moderate intensification that **respects the scale and character** of the neighbourhood. Policy 3.5.2 (b) speaks specifically to incorporating a range of intensification strategies for **modest** intensification in inner-city communities.
- As all the properties along this street face Memorial Drive, retail uses will attract non-local, commuter traffic from Memorial into the community, which will bring in significant vehicle traffic to this area. As this is a single-lane one-way street with parking on one side of the street only, and no opportunity for underground parking due to the existing contamination, vehicle traffic will undoubtedly overflow into other parts of the community.
- This area is contextually different from Memorial Drive in Sunnyside (east of 10<sup>th</sup> Street).

- This area exists west of the Memorial Drive P.M. Lane Reversal, where three of the four lanes along Memorial Drive are dedicated to the westbound traffic to facilitate the movement of commuter traffic from the



downtown. **City Administration previously confirmed that no traffic lights or at-grade pedestrian crossing to access the Bow River Pathway are possible** along this stretch of Memorial Drive, unless the lane reversal was to be removed.

- Pedestrian overpasses to provide access to the Bow River Pathway are not feasible at this location due to the narrow pathway on both the north and south side of the river.
- The speed limit along this stretch of Memorial Drive changes from the 50 km that exists along the Sunnyside portion to 70 km to facilitate the movement of commuter traffic.





- There are no properties along this stretch that abut/front Memorial Drive. ALL properties front Westmount Boulevard, which is a single one-direction residential roadway, and are separated by a treed median with grade-separation.
- There are no sidewalks along Memorial Drive at this location, and no pedestrian activity.
- While the Riley Local Area Plan suggests the possibility of a pedestrian overpass to link this area to the raised Sunalta LRT Station, no feasibility study has been done to support this idea and the extensive infrastructure investment needed is unlikely, given that there was no budget to even replace the life-cycling of the 14<sup>th</sup> Street pedestrian overpass at 7<sup>th</sup> Avenue (was replaced with an at-grade crossing).

## 2. Requested Amendment #2: Policy to Address Creosote Contamination

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- According to the February 2024 paper published by the Environmental Law Center (Alberta) – [\*The Regulation of Pollution and Contaminated Sites in Alberta\*](#) - building on contaminated land is complex and requires careful planning, regulatory complication and often substantial remediation efforts. This is especially true when municipalities and the province have shared jurisdiction. A key finding of the report was that there is currently a **“lack of regulation for risk management through exposure control at contaminated sites in Alberta”**. One of top seven recommendations stemming from the report include **“Implementing a comprehensive regulatory regime for risk management through exposure control at contaminated sites”**.
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- A creosote remediation facility (pictured) is located on the south side of the river to actively reduce the creosote levels in that area. No such remediation is taking place at this location – where there is existing residential.
- There are no existing policies or procedures to regulate or monitor the creosote vapour release resulting from new development. This puts the existing community at substantial risk.
- Disregarding the complexity of redevelopment and placing development pressure in this area puts the safety of area residents at significant risk. **It also places an unfair burden on area resident to continuously monitor, and be actively involved in, all redevelopment activity in the area,** which should be the role of City Administration as the regulatory body.
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Creosote Facility @ Pumphouse Park

### 3. Requested Amendment #3: Do not require one-side of Westmount Road to be rear-facing.

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- This policy applies to **nine residential blocks**. At the rate of redevelopment and considering the number of newer housing stock, it will be many generations before this area is converted fully to properties facing Kensington Road. In the meantime, this area will be a mix-match of front-facing and rear-facing property along both Westmount Road and Kensington Road that will not serve anyone.
- This policy is disrespectful to the existing residential community and will have a negative impact on both property values and the strong sense-of-community for this area.
- Improved urban design along the southside of Kensington Road that incorporates part of the existing road right-of-way would create a better pedestrian environment without impacting the existing community.
- Respecting the historical neighbourhood layout is critical to maintaining this area's strong sense of community.



Westbound 1600 Block Westmount RD – showing newer and older development pattern

## COMMENTS ON THE PUBLIC ENAGEMENT PROCESS:

### 1. Substantial written and in-person feedback was not recorded and not considered in this Plan.

- Area residents attended the Open Houses and online events held during Phase 3 of this Plan, and submitted written comments that summarized key points. This feedback was not captured in any way in the What We Heard Report or What We Did Report, and both reports failed to capture the general sentiment of the Open Houses or online events. When asked about this, City Administration confirmed that the written feedback was not incorporated because one submission was received that was signed by many households. ***They considered this a petition and dismissed the substantial feedback from 18 households.*** For the Open House comments, we were told that they were grouped by category, but when we ask for them to show us where the general sentiments we communicated were listed, they were unable to do so. City Administration committed to following up with us on this issue, but never did.