Spruce Cliff Community Association Comment

RE application LOC2017-0398 3355 Spruce Drive SW

2018 01 20

The Spruce Cliff CA offer the following comment in response to the circulation request and the applicants submission. (extracted quotes in italic)

On behalf of the SCCA - thank you for the opportunity to participate in the process.

Lois Sime

Spruce Cliff CA

Site context

There is a mix of land uses.... Wildflower Art Centre is located north of the subject site — clarify this is a "tenant" not a land use — the land is zoned RC2 not green space.

Proposed Land Use District

This re designation application Due to its location is not possible to provide a rowhouse building under the RCG designation - what is the foundation for this statement as we understand this is not a concurrent application -are there site studies available to support this statement? Density and height modifiers are proposed.... the "d75 although it restricts height to 12 M— this does not seem to address lot coverage or percentage of amenity space requirements.

Spruce Drive for the walking /cycling evening commute north is already in shadow from 11th Ave to 8th Ave – a built form on this site that further shadows the pedestrian environment would not be community friendly.

Parking and Access

The subject site is located on a lane - 2 lanes - grade does not allow waste & recycling services from the lane which are currently managed from the front street- Spruce Drive sidewalk or bike lane location- currently 2 & 1 bins from this site to become 8 & 4 bins with this 4-unit proposal.

The bike lane on the west side of Spruce Drive — eliminated the curb parking, across the street from this property the bus zone has no curb parking, the east /north side of 8th Ave has no parking for site lines for the infirmed at the long-term care center, to the west of Spruce along the north side of 8th Ave there is no parking due to two driveway lanes, and a "future signed bus zone". In the radius area there is no curb parking on any of the 4 perimeter sides of the 3 high rise towers, nor in front of the Tri services Centre along 8th Ave. >.... this collective picture leads us to conclude there is an onsite requirement for visitor parking.

Lane access to this parcel is from the west off of Poplar Road. The grid street pattern in the community has only 8th Avenue and 3rd Avenue as the east /west links from the Spruce Drive residential collector. The lane to the north of this parcel is not "closed" but gated (locked) for emergency access — as this lane was being used as an extension of 7th Ave without the width, paving, curbs etc. to support that volume of use. Access to the parcel from the lane to the east is impeded by a significant elevation change and above grade utilities & pole.

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The lane elevation slope is believed to be a factor is why Waste & Recycle services are currently from the front street along Spruce Drive and Poplar Road for this block.

Relevant Policies

The subject site is included in the Developed-Established Area of the Municipal Development Plan > 3.5.5 c) New Developments in Established Areas should incorporate appropriate densities, a mix of land uses and a pedestrian-friendly environment ...

Sidewalk widths have not been adjusted to reflect the TOD/Activity zone even though the proximity is used as justification for density increases. (Activity Zone SC planning statement pg. 10) Waste and recycling pick up from the front street sidewalk and / or bike lane is NOT pedestrian or cycle friendly – the bins from the current single-family home are often knocked over the sidewalk when place in the bike lane and when placed on the sidewalk take up the majority of the walking width.

The MDP also talks about a quality built environment – one does not see a lane lined with 12 waste & recycle bins visible from the collector / pedestrian route to the LRT / shopping as a quality environment – on site storage of this needed service needs to be in the plan and reflected in allowed built form coverage zoned for the site. The change of site elevation from Spruce Drive to the east lane makes it unlikely anyone would be able manage the manual movement of bins to that elevation. Any approved lot coverage/ land zoning for the site needs to have a realistic onsite accommodation/ solution for this essential service.

We often hear that single parcel residential project design details have low impact and are not given the same urban design scrutiny as a larger scale project – yet the sum of the collective parcels in the end has the impact of a large project.

This site is part of a small block of six parcels in a very visible strategically important spot in the community. We encourage a collect of parcels before rezoning/redevelopment in this block, as it would offer greater design opportunities and solve some of the site access issues identified by the applicant.

Four units are proposed to be developed on the site. ... a density and height modifier is proposed to be added to the MCG designation—we would hope to have a built form that does not allow a stacked 4 plex box form with little onsite amenity space that shadows the pedestrian/cycle route to shopping & the LRT or one that increases curb cuts in this high pedestrian traffic area.

It is our intention to submit a Development Permit application for the proposed development while the land use re designation is under review. If this work is being undertaken to meet this time line why was a concurrent application not submitted to give the community / council more certainty as to quality and form? There would not appear to be any additional costs for the applicant with this identified time line.

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On a collector or Higher standard road way — Spruce Drive is a residential collector through the center of the community — that lost half of its curb parking to accommodate bike lanes — sidewalks are the original (with some patching infill sections) from the 50's.

It is not uncommon for pedestrians to have to move to walking on the street to pass walking traffic or the under 14 age cycling group that use the sidewalks. Would this city "gifted density increase" generate a public realm improvement for the community?

If our own density increase developments (with in the community boundary), like this application, do not generate the public realm improvements, the West LRT development did not generate the improvements, what will?

Adjacent to or across from an existing or planned open space or amenity – yes. We believe the applicant should have answered NO to this question – as we often hear- Land use is about the Use not the User... the land parcels to the north of this site is zoned RC2 and although we understood that the City was at one point negotiating with the current land owner to acquire the lands for community park space and anchor a liveability index ratio for our growing population ... as was reflected in the analysis and inclusion of these lands as green space in the 2012 Spruce Cliff Community Planning Statement (map page 21). Those negotiations did not secure the land and we believe there are no current undertakings to reopen the negotiations.

We would be happy to be wrong in this belief; especially as in the context of TOD area and overlapping Activity Zone with the planned density of population just south surrounding the Westbrook LRT station; that has very little green space shown in the plan. Those residents will need to travel north to Spruce Cliff for that recreational amenity... another reason to widen the sidewalks

Direct lane access- yes -as noted above not currently accessible by waste and recycling services

Conclusion -

There is a mix of residential districts in the area currently including RC2, MC1 & MC2

Spruce Cliff has never been granted an ARP but have our non-statutory Planning Statement to guide development. With our community plan (SC Planning Statement map pg. 8), the transition perimeter for the high-density DC, MC1 & MC2, many of which have buildings that are at the end of their lifecycle, and are built at much less density than is allowed, was seen to be defined by Spruce Drive on the west and 8th Ave on the north. The transition point from High / Medium to the Lower density forms RC2 & RCG balancing for the MDP desire for choice of housing mix in the community. This proposal seems to change that—it is a pretty safe assumption that the redevelopment of the higher zoned sites will not be developed at lower densities and in fact will likely be pushed higher — where is the line to protect the desired housing mix.

MCG allows uses beyond residential – could they be removed to ensure that the capacity to build population is not eroded with commercial activities?