

Bridgeland-Riverside Community Association Letter



Planning Committee
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brcacalgary.org

30 May 2017

Circulation Control
Planning, Development & Assessment #8201
The City of Calgary
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Attn: CPAG.Circ@calgary.ca
cc: Sara Kassa, File Manager (sara.kassa@calgary.ca)
Ali McMillan, BRCA Planning Director (planning@brcacalgary.org)

To Whom It May Concern:

RE: LOC2017-0127 (438 – 8 Street NE)

Thank you for the opportunity to comment with respect to the application for a Land Use Amendment affecting land at 438 – 8 Street NE (LOC2017-0127).

This Land Use Application was discussed at a meeting of our Planning Committee convened 18 May 2017. Notice of that meeting was given to neighbours adjacent to the subject parcel. Despite the relatively short notice that preceded the meeting, approximately 15 neighbours attended, as did many regular Planning Committee members. The applicant was also invited to the meeting, and did attend.

The comments below regarding the LOC application reflect the feedback of both neighbours and the BRCA Planning Committee members present at the 18 May 2017 meeting.

The application is seeking a new land use designation for the site of M-CG instead of the existing R-C2. We are strongly opposed to such redesignation by means of this application for several reasons:

- a. The Bridgeland-Riverside community will soon, after a long period of advocacy, benefit from a rewriting or an updating of our Area Redevelopment Plan (ARP). This endeavour is in its very preliminary stages. Although most stakeholders understand that there will very likely be areas of increased density contemplated by this planning exercise, it is exceeding problematic to preordain the outcome of a broad community-wide engagement process that is today in its most preliminary phase. The zoning proposed, in the particular location proposed, is met with significant opposition both by individuals who are members of the BRCA Planning Committee

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and also the local area residents that attended the meeting. Residents who have communicated on this file with BRCA feel very strongly that a significant upzoning of a parcel without the pending framework of the broader planned approach is detrimental to the community as a whole, and we do not wish to see precedent set in what is our current "conservation zone" without a larger vision in place. We do not speak here of "precedent" in any file-specific sense (we realize that the outcome of one application is not "precedent" *per se* for the next one), but the contextual reality is that this application seeks a significant upzoning very much "in the sensitive middle" of the area that is now slated for fresh long-term planning. A decision of this magnitude in that location could not help but impact the larger planning process, pre-engagement.

- b. Outside of the coming ARP which will address any changes of zoning within the community, the zoning type proposed, in the particular location proposed, is met with significant opposition both by individuals on the BRCA Planning Committee and also by local area residents, due to the lack of context of the M-CG zoning within the surrounding area. The parcel in question is situated in the heart of the RC-2 region of the community, a significant distance from the rather extensive regions of the community already zoned for M-CG and higher density build forms. It is inappropriate to place a non-contextual zoning type in this location, where there are ample redevelopment locations within Bridgeland/Riverside for this zoning type. There are extensively remediated historical homes and new infills adjacent and in close proximity to this site that respect the current zoning configuration.
- c. The City is also currently in the process of implementing City-initiated re-zoning for a significant corridor of properties one block south of this application site between first and second avenues via the Main Streets Project, which allow for up-zoned built forms including M-CG. With the pending re-development area created by Main Streets and the prevalence of M-CG zoning permissible within it, the City has created a more suitable area for this exact zoning after extensive research and engagement of their own. The parcel in question is considerably outside this region. Issues here are not just the long-term future for what is currently called the "conservation zone" but also the correspondence between contemplated built forms in the Main Streets areas and the area containing this application. The BRCA has been largely accepting and participatory regarding these increased density objectives within the areal limits of the Mainstreets Project (which affects approximately 14 full blocks of our neighborhood). But extending similar zoning (and the ensuing built forms) to the very centre of the remaining, yet-to-be-studied-or-considered R-C2 "conservation zone" is not justifiable. It may never be justifiable, but certainly it is not justifiable today without broader consideration / community-wide planning being completed first.
- d. Further, the zoning that has been applied for is not tied to development permit plans. While a concurrent DP for the land is under City review (DP2017-1699), this LOC application is not actually tied to those plans in a formal sense. If the higher zoning was hypothetically approved, there is no assurance that the proposed design will lead to the proposed result. With an approved M-CG zoning decision in hand, the developer/applicant in theory could change architectural direction and develop a project that exploits the full extent of the MC-G capacities: *i.e.* increased density, unit count, building height, and streetscape impact. Or the

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developer/applicant could elect to sell the site with its newly approved zoning to another developer who has made no appealing development claims to the community. Or any one of many imaginable external factors could intervene to disrupt even a well-intentioned project, leaving the site with M-CG zoning unconstrained by current development permit plans.

It is rare in the experience of our Committee that unanimity presents itself on any topic. In this case, however, all persons attending the meeting on 18 May 2017 agreed in clear terms. We are squarely opposed to this LOC application as is the Board of Directors of the BRCA. It is unnecessary in relation to density objectives in our neighbourhood at this time, it completely undermines the dwindling R-C2 "conservation zone" and will stifle creative consideration of that area in the forthcoming ARP process, and it has been brought forward in a manner that is pre-emptive of all such considerations despite BRCA and various neighbours having expressed these concerns directly and clearly to the applicant pre-application.

The granting of this application could invariably lead to other such applications that would effectively extend the density and built forms theorized by the Main Streets Project, but without regard for that Project's geographical limits. If the desire for such an extension had been adequately confirmed by prior engagement of our community, then BRCA would have been the first to urge Mainstreets to extend yet further north. It was not, and we have not.

It seems impossible to comment upon this application without emphasizing its reality on a map. Below is a simple map of our neighbourhood.



The lands highlighted in yellow are the Bow Valley lands, which have long been the subject of their own (post-General Hospital) planning and which are designed for large

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multi-family developments.

The areas highlighted in green comprise the so-called "East Riverside Master Plan" lands. Many institutional owners are stakeholders in this area and huge changes are forthcoming, including Alberta Health Services' announced \$130M redevelopment of its cornerstone site. The East Riverside Master Plan has outlined significant opportunity for multi-family/ mixed use/ townhouse developments within this area plan.

The area highlighted in blue generally defines the Main Streets lands, which are midrise and transitional multi-family development locations. And the black line is roughly where the escarpment begins with the escarpment (steep hill) being a strong topographic feature of our neighbourhood, which has a natural and pronounced impact upon building feasibility, built forms, and traffic patterns and connections.

In the remaining area that has been left un-highlighted—all of which falls within what the current ARP calls the "Conservation Zone"—the site of this application is identified in red. In our view this map makes it obvious that on the eve of deciding how to plan the evolution of the neighbourhood, that this proposal is inappropriate. To explain in metaphor...imagine planning a garden for the next 10 or 20 years, but somebody now proposes to plant a tall evergreen in the very middle as a pre-planning step? Maybe an evergreen is right for that spot, or maybe not, but one thing is for sure: if it is planted, then the option to plan the garden will be significantly impaired. The forthcoming task of the ARP project will already be daunting in terms of stitching together and rationalizing these several disparate planning areas and initiatives, but it is bad planning to allow an application such as this to define the future when our community has both embraced and is currently planning additional areas for significant redevelopment as a collaborative approach to achieving MDP goals.

Our community has been enthusiastic about our upcoming Area Redevelopment Plan undertaking as an opportunity to say, "Yes in my backyard" with a planned approach. We find that this application potentially strikes at the heart of that enthusiasm. If this application were to succeed, then we would inevitably be left feeling that the forthcoming ARP process has been hollowed out before it has even begun, and also that the long-term planning guidance that our neighbourhood hopes to secure with its new ARP will instead perhaps simply devolve into more of the "site by site" (aka "*ad hoc*") planning that has exhausted so much energy for all stakeholders, including the City, these past recent years an resulted in a continually adversarial planning process.

The following points made in the existing the Bridgeland-Riverside Area Redevelopment Plan—our current statutory document, arrived at via a process of broadly planning the neighbourhood over many years and with much public input states—are apposite:

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

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- **"To conserve and stabilize the family oriented areas of the community and to ensure their long-term viability."** A primary focus of the Neighbourhood Improvement Program is to ensure that older residential neighbourhoods are improved and stabilized. The Inner City Plan, while calling for increased densities in such areas, also recognizes the need for stabilizing portions of neighbourhoods by **conservation** so that opportunities for family living remain." (Page 9, point 8, emphasis added)
- "That preservation and enhancement of appropriate portions of the community for families with children be strived for, that areas **suitable for higher density development be identified and that such developments minimize impacts on the remainder of the community.**" (Policies, page 10, **emphasis added**). (Parenthetically: obviously a point here is that much of our community has already been identified to accommodate increased densities—especially the majority of our community areas south of First Ave NE and the entire 14 blocks of additional Main Streets rezoning upcoming. The question arising—not for decision today but properly for broad engagement via an ARP process, is what the "remainder of the community" might mean for Bridgeland-Riverside, since these are the areas where the "impacts" are to be "minimized".)

As a final substantive topic, we also understand that the City has typically been using "Location Criteria for Multi-Residential Infill" in its evaluation of applications such as this one. In italics below are our comments on each of the pertinent criteria as relates to the present application:

Location Criteria for Multi-Residential Infill

1. On a corner parcel – references here the MDP Section 2.3.2 b.

a. Respect the existing character of low-density residential areas, while still allowing for innovative and creative designs that foster distinctiveness.

The key point here is "respecting the existing character" of the neighbourhood, especially due to the high-value heritage properties that back onto the site in question.

b. Ensure an appropriate transition of development intensity, uses and built form between low-density residential areas and more intensive multi-residential or commercial areas

This site in question is NOT a transition area but instead lies directly in the heart of the small portion of the remaining R-C2 area ("conservation zone"), one block from the end of the Main Streets zone.

c. Ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern.

Again due to the high value of the heritage homes to the immediate east and also the nature of the surrounding community context in general, we feel this criterion is not met.

2./3. Within 400 m of a transit station/ 600m of a primary transit stop.

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All of Bridgeland is walkable to shops and transit within relatively short distances. However does that mean all of our community should be multi-residential? We have encouraged density closer to transit, e.g. East Riverside Master Plan as a TOD site situated adjacent to the C-Train station, or Mainstreets upzoning proximate to the 1st Ave bus route. This is why we feel these other areas of our neighbourhood need to be planned in a broad sense while looking at the community as a whole.

4. On a collector or high standard roadway at least on one frontage.

4th Ave NE is not a collector road or high standard roadway but a residential road only. Access onto 4th Avenue NE from Edmonton Trail is constrained by traffic control (no left turns) during peak periods.

5. Adjacent to existing or planned non-residential development or multi-unit development.

Again, this site is in the heart of the "conservation zone" surrounded by R-C2 homes and is not a transition area. There is no non-residential development or multi-unit development in any of the surrounding blocks.

6. Adjacent to or across from an existing or planned open space, park or community amenity.

This criterion is not applicable to this site – no park, open space or community amenity is nearby.

7. Along or in close proximity to an existing or planned corridor or activity center.

This criterion is also not applicable to this site – there is no corridor or activity center anywhere nearby.

8. Direct lane access –

The majority of our community has direct lane access due to the historic nature of the community and the established grid pattern of the streets. For this reason most lanes are very narrow, gravel lanes with wooden power poles that are not well suited for multi-residential access or infrastructure requirements (i.e. garbage handling and removal).

When corner parcels of land such as the site in this case have been publicly considered on their planning merits as candidates for rezoning, both in light of the development trends in Calgary and in our greater community (through rewriting of our ARP), we may one day reach a different conclusion. Or not. But regardless at this time we cannot support this application.

Sincerely,

BRIDGELAND-RIVERSIDE COMMUNITY ASSOCIATION

Per: BRCA Board of Directors
Planning Committee