

## Bridgeland Riverside Community Association Letter



Planning Committee  
917 Centre Avenue NE Calgary AB T2E0C6  
brcacalgary.org

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Circulation Control  
Planning, Development & Assessment #8201  
The City of Calgary  
PO Box 2100 Station M  
Calgary AB T2P2M5

**Attn: CPAG.Circ@calgary.ca**

cc: Steve P Jones, File Manager ([steve.jones2@calgary.ca](mailto:steve.jones2@calgary.ca))  
Ali McMillan, BRCA Planning Director ([planning@brcacalgary.org](mailto:planning@brcacalgary.org))

To Whom It May Concern:

**RE: LOC2017-0400 (523 – 8 Street NE)**

Thank you for the opportunity to comment with respect to the application for a Land Use Amendment affecting land at 523 – 8 Street NE (LOC2017-0400).

This Land Use Application was discussed at a meeting of our Planning Committee convened 4 January 2018. Notice of that meeting was given to neighbours adjacent to the subject parcel. Despite the relatively short notice that preceded the meeting, approximately 7 neighbours attended, as did many regular Planning Committee members. The applicant was also invited to the meeting, but was not able to attend.

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

The application is seeking a new land use designation for the site of R-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 be areas of increased density contemplated by this planning exercise, it is exceeding problematic to preordain—or worse, debilitate—the process and outcome of a publicly-funded, broad community-wide engagement process that is today in its most preliminary phase. (This ARP process itself is also the result of numerous workshops, research papers and public outreach initiatives for years

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prior to its launch.) The zoning proposed, in the particular location proposed, is met with significant opposition both by individuals who are members of the BRCA Planning Committee, the BRCA Board, and also the local area residents that attended the meeting. Residents who have communicated on this file with BRCA feel very strongly that upzoning of a parcel without the pending framework of the broader planned approach is patently detrimental to the idea of planning the community as a whole and we do not wish to see precedent set for "lot by lot" decision making in what is our current single family / RC-2 "conservation zone" without that larger vision in place. Any decision to allow an upzoning in a location like this one which is in the middle of a historically defined low density region could not help but impact the larger planning process. The point is therefore not our opposition to "precedent" at the level of the parcel (*i.e.* we realize that planning decisions do not consider prior decisions as "precedents" in the narrow sense). Rather, our opposition is to what approval of this application would signify in terms of demonstrating the necessary respect for an ongoing engagement process, and for the holistic idea of planning our community first, and our parcels second. The "precedent" we worry about here is the "precedent" of wrecking a coherent approach to planning and 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 local area residents due to concerns about implications of 3 units on a relatively small lot; waste and recycling pick-up, narrow alleyways, increased height and massing and effects on enjoyment of backyards, shadowing and overlooking concerns and the effect on the traditional pattern of the block with rear detached garages. There may be significant weight to such concerns. For example, with 3 on-site parking stalls being required with laneway access each, as well as staging room for 12 refuse/recycling bins on "pickup day", it may be true that the required linear alley frontage does not exist and compliance by the applicant would not be possible. Should a decision to rezone to RC-G be considered when land use requirements of that designation may be impossible to achieve?
- c. Further to the zoning issues, the City in 2017 implemented City-initiated re-zoning for a significant corridor of properties south of this application site between first and second avenues via the Main Streets Project, which allows for up-zoned built forms including R-CG and M-CG. Within this re-development area already created by Main Streets in an area within this community that the City's extensive research / engagement found to be most suitable for up-zoning, the City has created and already defined a nearby area known to be suited to this exact zoning typology. The parcel in question is considerably outside the area identified by the City as appropriate for Main Streets City-initiated upzoning. Issues here are not just the long-term future for the area in the community 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 increased density objectives within the areal limits of the Mainstreets Project (which affects approximately 14 full blocks or roughly 20% of our neighborhood). But extending similar zoning (and the ensuing built forms) to the very centre of the remaining, yet-to-be-fully-studied-or-considered single family / R-C2 "conservation zone" is not justifiable at this time. It

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may never be justifiable, but certainly it is not justifiable today without the already pending City-funded process of broader consideration / community-wide planning first being completed.

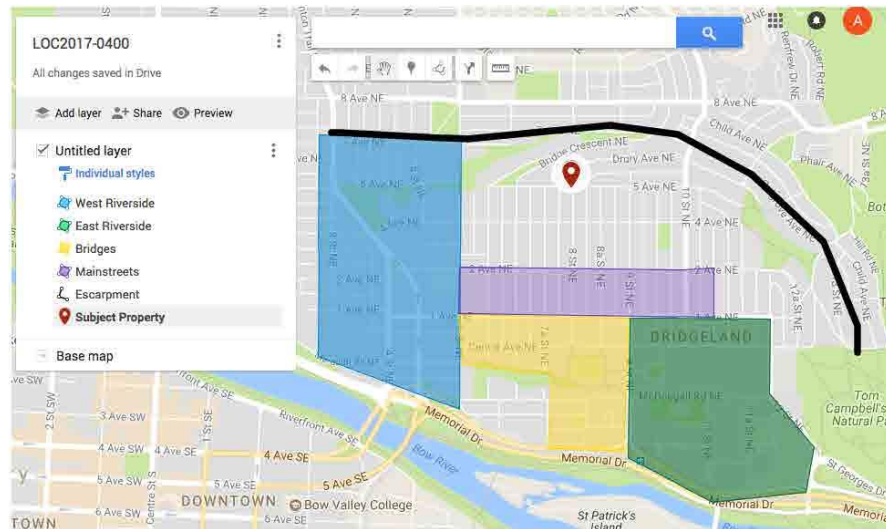
- d. Further, the zoning that has been applied for is not tied to development permit plans. While a concurrent DP for the land is expected to be submitted shortly, this LOC application is not actually tied to any plans in a formal sense. If the higher zoning was hypothetically approved, there is no assurance that the suggested design will lead to the proposed result. The applicant references a design for this site with 2 or 3 bedroom units. Without actual concurrent plans, there is no guarantee these will be built. With an approved R-CG zoning decision in hand, the developer/applicant in theory could change architectural direction or the 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 R-CG zoning unconstrained by current development permit plans.

The BRCA Board of Directors and Planning Committee are squarely opposed to this LOC application at this time. It is unnecessary in relation to density objectives in our neighbourhood with huge swaths of the southern belly of the community already experiencing the development of (for our community) massive multifamily projects. It completely disregards the existing R-C2 built-form character of the “conservation zone” and will stifle or inhibit the fresh creative consideration of that area in the forthcoming ARP process. Additionally, and frustratingly, the application has been brought forward in a manner that is pre-emptive of all such considerations despite BRCA having expressed these exact concerns directly and clearly to the applicant pre-application. This applicant has had every opportunity to consider simply waiting until late 2018 to see what direction the new ARP process will provide. Instead the application has come forward now apparently for economic reasons only. When do we reach the point where we simply say to speculative land developers that their speculation may have to wait for new planning guidance to arrive or else they must simply be content to develop within the limits of what they bought—*i.e.* RC-2 zoning? The right of a landowner to apply for a new land use designation under the Municipal Government Act cannot somehow become the justification, in the name of high-level density objectives under the Municipal Plan, for allowing spot zoning of an area already subject to active reconsideration for a community plan.

In the same vein, the granting of this application could obviously encourage 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.

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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 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 and mid/high-rise developments within this area plan.

The area highlighted in purple and 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” (which is and has been the sole region of the community oriented to single family and duplex homes)—the site of this application is identified in red and it sits in the very heart of this area. In our view, this map makes it obvious that on the eve of deciding how to plan the evolution of the neighbourhood, =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 simply bad-planning to allow an application such as this to define the future when our community has both embraced and is currently planning

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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, in the appropriate areas. We find that this application potentially strikes at the heart of that concept and 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 process initiated by the City, and the planning guidance that our neighbourhood hopes to secure with its new ARP will instead devolve into a continuance 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 – and that has 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)
- **"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). (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. You will note that this application only meets two of the eight criteria.



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### 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. While we can appreciate that the applicant references the benefits of doors facing the avenue, we would be requiring this with a duplex/ laneway home orientation as well, which may be more appropriate for this small site.*

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”), many blocks away 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.

*The impacts of 3 units on a lot of this size, with an atypical site orientation to the present pattern of the neighbourhood (i.e. street-facing front doors in this area, detached rear garages) needs to be further examined.*

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

*All of Bridgeland is walkable to shops and transit within relatively short distances, but that does not mean that all of our community should be multi-residential or else none of the planning engagement that has already occurred or that is yet expected would have been required. We have encouraged density in areas especially close to transit—for example, with the East Riverside Master Plan identified as a TOD site situated adjacent to the C-Train station, or with Mainstreets upzoning proximate to the 1<sup>st</sup> Ave bus route.*

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

*5<sup>th</sup> Ave NE is not a collector road or high standard roadway but a residential road only (the same is true of 8<sup>th</sup> St NE).*

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.*

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. The applicant cites McDougall Park which is walkable at a distance from anywhere in Bridgeland or Riverside. This is not the true proximity that this criterion speaks to.*

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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). How will three bins for three units (9 bins total) fit on such a narrow lot with a narrow laneway with power poles, while still allowing vehicular ingress and egress to and from the site's required garages?*

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 and we ask the City to refuse this application at this time.

Sincerely,

BRIDGELAND-RIVERSIDE COMMUNITY ASSOCIATION

Per: BRCA Board of Directors  
Planning Committee