

February 14, 2019

Dear Calgary Planning Commission Member(s),

I am contacting you regarding LOC2017-0406 (CPC2019-0153) on behalf of Genesis Land Development, **we are opposed to the application as presented in your CPC Agenda on February 21, 2019.** The subject site is located directly across and east from Sage Hill Crossing (see attached figure) which is identified as a Transit Oriented Planning Area in the Area Structure Plan (aka Community Activity Centre (CAC) in the Calgary Municipal Development Plan (MDP)). The MDP focuses Activity Centres in locations that will benefit a number of communities – Sage Hill Crossing is central to Sage Hill, Evanston, Nolan Hill and directly serves the High Density Residential Area to the east (which contains the proposed application).

Genesis currently has two active applications for land use and outline plan within the CAC and have been working diligently with the City since 2015 to develop this heart of Sage Hill. These lands have been sitting mostly vacant for the past decade due to the reduced demand for commercial in the area. As such, in order to align with demand, the landowners within the CAC engaged in a Developer Funded ASP Amendment from 2015-2017 with the City. At the time it was always presented to us that the area east of the CAC would not be involved in any amendments as the area was going to remain residential. The CAC landowners engaged in the appropriate Market Studies needed to support the ASP revisions – those studies included: Retail, Residential and Office evaluation. Subsequently the ASP amendments in 2017 reduced the commercial in the CAC to align with demand.

The proposed application will negatively impact the CAC and in our minds will take commercial away from where the City's MDP requires it to be built. The subject site was always intended for high density residential (and it is contained within the Higher Density Residential Area of the ASP), which helps create the critical mass needed to enable the success of the Town Centre. **We feel strongly that this site, as proposed, is not living up to the intentions of 'High Density' and there appears to be a gap in policy which we feel is being used at the convenience of the applicant.**

It is anticipated that around 75,000 square feet of commercial would be proposed on 2.3 hectares of land. This is significant given the commercial demand in the area. **Should CPC and Council approve this application, it would likely pull commercial away from the CAC.** It would be an unfortunate consequence if the town centre site was unable to be realized. Certainly we'd entertain reductions in the intensity requirement for CAC if this site is given some of the intensity. This illustrates why this discussion is more wholistic during an ASP amendment process which enables the area be reviewed together instead as stand alone sites.

With regard to this application, Genesis is concerned that the proposed 2.3-hectare commercial development (C-C1) has not been fully considered by Administration against the

Symons Valley Community Plan (ASP) due to the policy gap – which relates to size. However, the following outlines some areas of the policy that should be considered:

- **Lack of ASP Amendment:** The proposed area to be redesignated to C-C1 is 2.3 hectares in size. According to Section 6.5 of the ASP, land use and outline plans may not be approved for commercial sites larger than 2.4 hectares until an ASP amendment is approved. It is convenient that this development is only 0.1 hectares below the identified threshold, however the entire site, including the residential components is above this threshold. At a minimum, if the application were to remain as is, we feel that an ASP amendment should be undertaken to ensure this development will not negatively impact the wider community but rather have a positive impression on the Sage Hill community.
- **Regional Commercial Nature:** The subject site is located in the Higher Density Residential Area of the ASP. Section 5.16.2 allows for local and ancillary commercial within the Higher Density Residential Area. Given its size, the proposed commercial site should be considered more regional in nature and serving a catchment area much larger than the local surroundings. **As such, if the commercial area should remain it should be scaled back to a size that serves only local needs – 1-2 acres maximum.**
- **Presentation of a Concept Plan:** Section 11.1.2.2 of the ASP requires that prior to approval of a land use application, a concept plan for a commercial centre site of any size must be presented to Calgary Planning Commission and Council in order to assist them in their evaluation of the application. As well as other sections of the ASP, the concept plan would need to be evaluated against the Design Guidelines contained in Appendix I of the ASP. Does this application conform to the Design Guideline Policy?

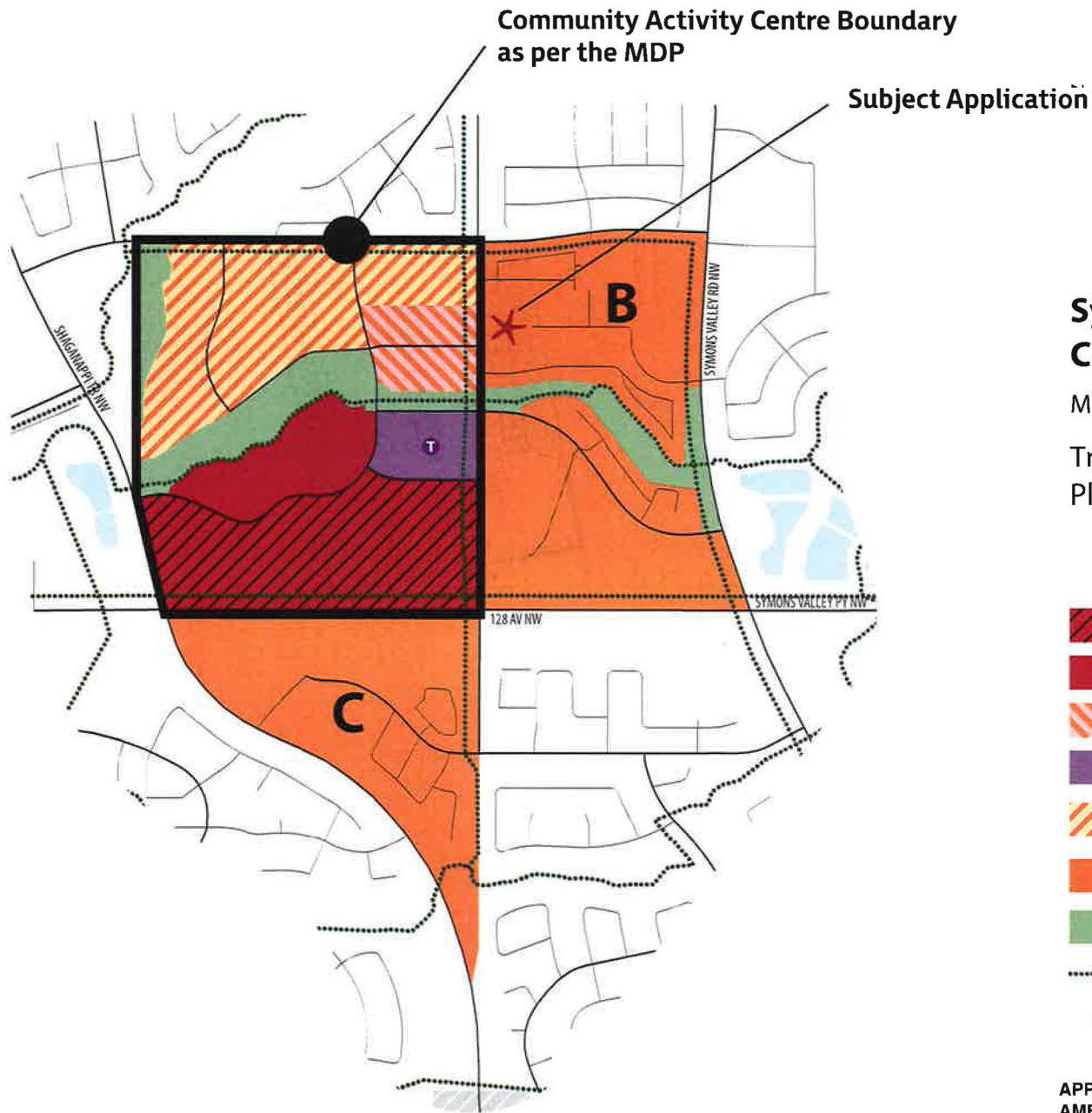
In consideration of the above, **we respectfully request that the Calgary Planning Commission refuse the application or reduce the commercial size to that of a local nature (2 acres maximum) and we hope that Council will undertake the same response.** The landowners within the CAC are doing their best to realize the intentions of the MDP and ASP. Having an application, such as what's being proposed, will have a negative effect on the success of the CAC.

Regards,



Kathy Oberg

B&A Planning Group



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AMENDED: 55P2017

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IN COUNCIL CHAMBER

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