

**Calgary Planning Commission Member Comments**



For PUD2019-0007  
heard at SPC on Planning and Urban  
Development Meeting 2019 April 03



Member	Reasons for Decision or Comments
<p><b>Commissioner Scott</b></p>	<p>Comments:</p> <p><b>GENERAL</b></p> <ul style="list-style-type: none"> <li>• Layout and graphic presentation of the plan, overall readability and legibility much improved from the first draft presented to CPC.</li> <li>• Appreciate additional clarity brought to some of the mapping and attempts to consolidate mapping.</li> <li>• General comment on new approach to Local Area Plans: the policy language in the Beltline ARP revisions (and responses to my questions at CPC on this topic) suggests there may be a need for a larger conversation around how the multi-document local area planning approach (Developed Area Guidebook, Centre City Plan, etc) is delivered through an ARP, ASP or other form of Local Area Plan and, possibly, a review process to ensure the intended outcomes are realized. Local Area Plans should reinforce references to external documents where this emphasis is required, for example given that a large part of the East Beltline ARP contains Calgary’s pre-eminent tourist attraction, additional references to the Centre City Plan and Access Design Standards in the Urban Design and Mobility sections would be appropriate. Also, assigning listing of supporting/ companion documents to an “Appendix” downplays their significance. Perhaps call that section Companion Policy, Standards and Guidelines?</li> </ul> <p><b>SECTION 1: INTRODUCTION</b></p> <ul style="list-style-type: none"> <li>• Still think the vision statement could be stronger and more inspirational to set the tone for the document, given the significance of this area to Calgary. Perhaps look to the RDMP for language cues. Vision Statement should be written in “future state” language, i.e. “is” not “will be”.</li> <li>• Move Vision Statement from 1.2 on pp6 to the “Introduction” cover panel.</li> <li>• 1.4 Core Ideas (p6) add accessibility as a core idea/part of a core idea, so “A Connected and accessible culture and entertainment district...”</li> <li>• (p6) Revise “Encouraging high-quality urban design” to “Requiring high-quality urban design” (this area contains a world-class tourism venue).</li> </ul>

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- (p6) reference to a “neighbourhood centre” at this point in the document requires some explanation of what a “neighbourhood centre” is.
- Map 1 (p8) – revise legend to read Stampede Park (Subject to temporary Closure)
- (p9 cover image) – could a less sterile image be used here? (Perhaps zoom in on the river edge part of the rendering)

### SECTION 2: INTRODUCTION

- (p10) Objective(s) – there is only one. Delete the “s” or add others. Suggested additional: Support creation of a lively and livable 24/7 community in the Rivers District; Establish strong connectivity and accessibility within the Plan area, to adjacent communities and the Centre City.
- 2.1.2 (p11) recognize that the existing community already contains pockets of high density development in the last paragraph.
- 2.2 (p15) add “s” to “neighbourhood” opening sentence.
- 2.2.2 (p16) revise first sub-heading to “Safety and accessibility in the public realm”

### SECTION 3: LAND USE

- Map 4 (p18) add reference to continuation of Riverwalk around Elbow River – south end of Stampede Park (regional pathway).
- 3.2 Land Use Policy (p20) reference to “Mixed Use-High Density” from DAG somewhat confusing. Either clarify or remove partial quote from DAG (see last comment under General comments, above).
- 3.2.1 Policy 3 (p20) would be useful to provide an example, e.g. “sleeving” larger-format uses with smaller uses?
- 3.2.1 Policy 4 (p20) acknowledge potential for other uses to impact care facilities as well (i.e. vice-versa)
- 3.2.2 (p20) clarify language/grammar in opening sentence: “Conference events and education” – perhaps just capitalization to signify a land use typology?
- 3.3.4 (p22) revise second sentence to “the scale and massing of existing development in the Warehouse District should be reflected in...”
- 3.3.6 (p23) Policy 3 revise to “Developments should incorporate...”

### SECTION 4: URBAN DESIGN

- Great cover image on p30!
- 4.3.4 / 4.3.5 (p34) check for inconsistency / conflict in references to new DC Bylaw and existing Centre City Illumination Guidelines (what if the new DC bylaw for this unique area conflicts with the CC guidelines?)

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	<p><b>SECTION 5: PARKS &amp; OPEN SPACES</b></p> <ul style="list-style-type: none"> <li>• 5.1 (p38) should Policies not reference cases where City land-owned land that is leased to the CE&amp;S and/or in full control of the City as priority candidates for community park spaces?</li> <li>• 5.2 (p38) opening paragraph – strengthen language and refine to require opportunities to support year-round activity in Stampede Park and other public open spaces.</li> </ul> <p><b>SECTION 7: ARTS 7 CULTURE</b></p> <ul style="list-style-type: none"> <li>• Add an objective to reflect importance of indigenous culture and history on p47 section cover (and/or add reference directly in section heading).</li> </ul> <p><b>SECTION 8: INFRASTRUCTURE &amp; ENVIRONMENT</b></p> <ul style="list-style-type: none"> <li>• 8.3 (p54) Reference VP bus barns in this section under 8.3 (reducing impact on environment).</li> </ul> <p><b>SECTION 9: IMPLEMENTATION</b></p> <ul style="list-style-type: none"> <li>• 9.1.6 (p57) rename heading to specifically reference the DAG – too vague as written.</li> </ul>
<p><b>Commissioner Palmiere</b></p>	<p>Comments:</p> <p><b>Editorial Comments</b></p> <p>Core Ideas make explicit reference to a ‘culture and entertainment district’ but the vision doesn’t – this should be amended</p> <ul style="list-style-type: none"> <li>• 1.4 Core Ideas – as stated previously these are floating. No intro, no discussion on where they come from and how they relate to the vision or the objectives. The result is a frontend to the document that doesn’t create a planning framework or establish a clear logical consistency.</li> <li>• 1.4 second paragraph second sentence – replace ‘would have been’ with ‘was’</li> <li>• 1.4 second paragraph – clarify what is meant with ‘suitable for indigenous policies to apply’ It reads like there are stock ‘indigenous policies’</li> <li>• 1.4 second paragraph – break into discrete thoughts (paragraphs) – muddled between first nations, the stampede, the flames and the broader vision of a culture and entertainment district.</li> </ul>

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- 1.4 under “A connected” – it’s strange to list major connection moves before the plan itself describes them or rationalizes their need. In fact, the plan really doesn’t rationalize their need and this should be addressed.
- 1.4 under “A resilient” exemplify best practices for green infrastructure by “encouraging environmental sustainability”? Oddly non-committal statement for an initial commitment to exemplify a best practice.
- 1.4 under “A Vibrant” clarify what is meant by “inner-city density”. Why not just call it out as high density? Inner City is vague. Hillhurst is inner city – so is Elbow Park.

### *Map 1 Plan Over view*

- How is this a plan overview when it’s just an infrastructure map with some open space?
- Why such specific looking Potential Open Spaces?
- Why the ‘triangular’ looking gap between Open Space and Potential Open Space adjacent to the river

*2.1 Plan Attributes* – why is it called plan attributes and not community or Plan Area attributes? Plan infers you are talking about the plan and not the place.

- As stated before, the front end of the document is jumbled – why are there community priorities, plan outcomes, and Core ideas? There is no established relationship between them so there is no way to understand why they are even necessary. Added to that there are objectives sprinkled throughout which just compounds the confusion.
- Page 10 – Community Framework the Objective needs to be rewritten as it is awkward
- 2.1.2 second paragraph – East Victoria Park is not ‘historic’. Wrong use of the word.
- Page 14 Last sentence of the first paragraph is awkward and needs to be rewritten.
- Page 15 first sentence – doesn’t intro the section or offer any insight. ‘local neighborhood identity’ redundant wording

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	<ul style="list-style-type: none"><li>• Page 15 2.2.1 second sentence – speaks to a change overtime but doesn't provide a time frame. Need to look at figure to provide info which isn't a good idea. Expand discussion.</li><li>• Page 16 – what is the point of the community priorities? The intro to that section needs a hard edit. Why aren't these objectives? How are they carried through the plan? Same comment for plan outcomes... why do these exist? Does the plan actual realize these? It's all very disjointed and because the plan doesn't care them through in any meaningful way, they become meaningless.</li><li>• Page 17 – land use objectives – fourth objective confuses density with massing</li><li>• Map 4 land use concept – why is the extension of 17th drawn as final – it's not fully designed and should be represented as a conceptual alignment</li><li>• 3.2.1 first sentence add 'building block' after Mixed Use-High Density</li><li>• 3.2.1 second paragraph – explain or reword 'base set of land use policies'</li><li>• 3.2.1.1 – why 'should' ?</li><li>• 3.2.1.3 – reword its awkward</li><li>• 3.2.2.1 Is not a land use policy</li><li>• 3.2.2.2 delete "in East Beltline"</li><li>• Overall the policies of 3.2.1 and 3.2.2 add little value and seem unnecessary</li><li>• 3.3.1 first paragraph makes little sense. An edit is needed - "it is encouraged to continue the historic character" but at the same it is a high-density, high-intensity district?</li><li>• 3.3.1.2 please clarify. Wider setbacks to accommodate active modes? Isn't it just pedestrians?</li><li>• 3.3.1.3 This doesn't mean anything. Same comments as the previous draft.</li><li>• 3.3.2.1 what exactly is meant by 'large commercial and retail developments' this policy is unclear and I don't</li></ul>
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	<p>understand how it will be implemented. It seems to imply multiple buildings within a development.</p> <ul style="list-style-type: none"><li>• 3.3.2.2 this is a vague policy. It alludes to smaller floor plates in 'other areas.' It doesn't define what a smaller floor plate is, if it is commercial, residential and or office – nor does it say where the smaller floor plate applies... it just refers to a ped map. It then suggests a smaller floor plate equates to a 'more pedestrian-oriented fine-grained urban fabric' but that is dubious connection at best.... Unless the policy is suggesting a small main-floor floor plate?</li><li>• 3.3.3.1 why those streets? Why not Stampede Trail and or 5th as well?</li><li>• 3.3.3.2 Is not a character area 'policy' that is a public realm consideration and shouldn't be in this section</li><li>• 3.3.4 is in contradiction to the density provisions for that area which are 7 and 12 FAR. How can one reconcile this? Keep the heritage but here's 12 FAR? 12 FAR will translate to 25-30 storeys. This section simply doesn't work.</li><li>• 3.3.5 how does the policy support the description "This area will become a showcase for local innovation and entrepreneurial spirit"</li><li>• 3.3.5.1 is a fragment. It isn't a policy.</li><li>• 3.3.6 intro implies an urban but intimate environment – doesn't remotely match the densities in the next section</li><li>• 3.3.6.1 so every frontage is an active frontage? Lanes? What lanes? that the problem with that part of East Vic Park – there are no lanes. The Plan needs a plan for the utilitarian aspects of development in the "River front residential"</li><li>• 3.3.6.3 – seems to be a contradiction with 3.3.6.1 which asks for active building frontages along the elbow river</li><li>• 3.4 these densities are massive. Has there been an analysis of the servicing capacity?</li><li>• 3.5.1 what heritage resources are available to send density? Is it geographically limited to East Beltline or can sites from West Beltline transfer density? What about mission?</li></ul>
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	<ul style="list-style-type: none"><li>• 3.5.3.2.V why is this here and why are we bonusing for this? In my opinion this is completely against the spirit of bonusing. Leasable, private space is not a public benefit.</li><li>• Urban Design Objectives – page 28 – need an edit</li><li>• 4.1 Site Design intro text reads like two separate design guidelines and not... an intro</li><li>• 4.1.1 remove first comma</li><li>• 4.1.1 – Reads like a guideline and not an intro to building setback policies</li><li>• 4.1.1.1 Reword first sentence for clarity and simplicity</li><li>• 4.1.2 – Intro reads like two guidelines and not an intro to Site Access and Loading policies</li><li>• 4.1.2.1 How will this be achieved when lanes are missing? Why isn't there a major move to establish laneways? This would be a much better bonusing objective than a Starbucks.</li><li>• 4.1.2.2 see above – create an incentive – or have CMLC find a solution with land owners.</li><li>• 4.1.3 This is strange to me – again, there are virtually no lanes. Making lanes happen would be a huge win for the plan and community. Right now these policies apply to the lane between 10th Ave and 11th Avenue.</li><li>• 4.2.2 “development at this location should promote high-quality architecture” how does a development ‘promote architecture’? Should be high quality? Sure, but reword. This plan is full of jargon and needs to be simplified for clarify. There are too many run-on sentences and too many vague planning and design ideas.</li><li>• Building Mass and Street Wall Relationship image (page 31) and the unnamed image on page 32 are floating in the text – they aren't referenced in any policy or intro section? Their utility is unclear.</li><li>• 4.2.3.2 While I agree in principle there is a risk of too many materials slapped on a building – a simple material palette is the best palette.</li></ul>
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	<ul style="list-style-type: none"><li>• 4.3 Building Frontages intro seems like a partial thought and need additional work</li><li>• 4.3.1 How exactly would one locate residential behind more active frontages? You don't wrap residential with CRUs like you can wrap a bank.</li><li>• 4.3.1.2 see comment above</li><li>• 4.3.1.3 do fitness facilities promote activity on the street. Case in point the 24hr fitness on 1st street.</li><li>• 4.3.2.1 How is this policy any different from the Active Streets policy 4.3.1.1?</li><li>• 4.3.2.4 Why should private development have to setback to provide additional event related ped traffic? How about we design the streets correctly and prioritize pedestrians?</li><li>• 4.3.3 Intro – remove 'for' in front of natural</li><li>• Map 7 – the open space frontages don't align with the potential open spaces shown on Maps 1 and 4? The way this section is written these policies of surveillance and animation don't apply to new open space... simply doesn't make sense. This section needs a rework.</li><li>• 4.3.3.2 – residential facing the CPR tracks to activate the open space? I think I must be missing something here as this doesn't make sense to me.</li><li>• 4.3.4.1 First sentence is awkward – reword for clarity</li><li>• 4.3.4.1.i – is unclear – a DC must establish a comprehensive sign plan?</li><li>• 4.3.5 Remove reference to digital signs. It is addressed in 4.3.4.</li><li>• 4.3.5.1 So the City isn't interested in dark skies, energy conservation and migrating birds?</li><li>• 4.4 Intro only speaks to public spaces but policies suggest circulation of private developments for CPTED review. Please amend intro.</li><li>• 4.5.1 Can be greatly shortened. It overlaps with earlier sections of the plan. It seems like a long intro for a simple, single policy.</li></ul>
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	<ul style="list-style-type: none"><li>• 5.1 First sentence is the first time the plan is called the ARP.</li><li>• 5.2.1 Add “buildings” after e.g.</li><li>• 5.1.2 and 5.2.4 speak to the same spaces and their acquisition... well 5.2.4 also suggest they can remain private – clarify and merge together.</li><li>• 5.2.3 This is a vague policy with no parameters and no teeth. The river is addressed in more detail in 5.3.</li><li>• 5.3.1 As stated before this policy needs to be reworded – I assume it means you establish the top of bank and then create a setback line 10m to the west – no shadows east of that line. But then again, I am not 100% sure</li><li>• 6.1 Again a lane reference. We really seem to like that one lane.</li><li>• 6.1.1 Is this really necessary? Doesn't the gird already do that?</li><li>• Check numbering as there are two 6.1.1s</li><li>• 6.2 We will need lanes for a separated cycle track to be effective.</li><li>• 6.3.1 Are there any issues that we are trying to get roads like 12th Avenue to accomplish too many things?</li><li>• 6.5.1 Why would this only apply to applications adjacent Stampede Trail? This by default suggests no relaxations are allowed in other areas. This is a basic principle of policy writing.</li><li>• 7.1 second paragraph “Winter culture activation” strange term.</li><li>• 7.1.4 how would one do a mural along an active frontage? A blank façade I can see, an active frontage... that's a challenge</li><li>• 7.1.5 Anywhere in the plan area? Seems strange. Wouldn't you want them focused in the Stampede Grounds or at least key areas?</li></ul>
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- 8.2.1.2 Where is this required? How will it impact the overarching goal for animation and street activation?

### Planning Concerns

#### *Density vs. Character vs. Placemaking*

- 3.4 there is no clear connection to how the character areas, which speak to built form, complement the Density and Composition section. In fact, there appears to be a total disconnect and they are at times at odds with each other. For example, the Riverfront Residential is characterized as neighbourhood for families and children with a range of housing types. Also, it is encouraged to continue the historical character of the warehouse district. Yet when looking at the density section – densities A,C,D and E apply. These areas allow stand-alone commercial from 3-8FAR. This is a massive amount of commercial potential and hardly residential in nature. Conversely, the residential FAR is massive and will surely result in built forms inconsistent with the historical warehouse character and will also lead to a single development typology – tower and podiums.
- Warehouse district is B,C,E which are significant densities – tower densities. Yet the character area suggests “The Warehouse District’s scale and massing should be reflected in any new developments” Unless one is discussing, massive podiums this will never be realized.
- There seems to be an underlying tension between existing densities and desired character. I realize that downzoning is a sensitive topic, but I would suggest it needs to be considered. If the character statements are a genuine expression of the desired built-form and community outcome, then the as-of-right densities are a significant barrier to the plan’s success.

#### *Open Space*

- Overall the plan is lacking programmable open space. With 15,000 residents and 23,000 jobs, its not reasonable to assume open space needs will be satisfied with the linear open spaces along the river and proposed open spaces along the rail. It seems that the plan is relying on private open space which is unfortunate as public open spaces are a critical component of ‘liveability.’ I am surprised there isn’t an open space ‘big move’ in the plan. Inner city areas need open space and the Beltline is deficient. There should

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be a bonusing, cash in lieu for MR or just the strategic decision to fund a new open space. Another option, as a major landowner in the area, would be for the City to create a park from its holdings.

### *Parking*

- This plan should be bold. There are three LRT stations, a BRT along 9th, bus routes, and cycle routes in the plan area. It is likely the most TOD area of the city. This plan should set the tone for a renewed commitment to transit and active mode lifestyles and remove parking minimums.

### *Family Units*

- The plan speaks to families and suggest that family-oriented housing will occur in the Riverfront Residential. There needs to be an incentive to make this happen. Despite all of the development in the Beltline in the last 10-15years, there has been limited to no increase in 3-bedroom housing stock. It's expensive, and on a cost per sqft basis buyers have significant options in other inner-city communities which win out. The plan should perhaps look at an FAR exclusion for three bedroom units up to a maximum of 1 or 2 FAR.

### *Transit Facility*

- The plan suggests the medium to long-term retention of the transit facility. While I can appreciate building a new facility will require money, land and time, its relocation and the unlocking of those lands will be critical to the plan's success. This plan should prioritize the relocation of the transit barns and really look at what those lands (and by extension the City) could offer the community.

### *Signage*

- 4.3.4 Digital Signs – Map 8 – why would we accommodate significant digital signs along 12th? There is an existing residential community and the potential for 1000s of new residents. I can appreciate signage along the festival street and the 17th Avenue extension but 12th will negatively impact residents. Also, the plan is silent on advertising. Digital advertising is big business. Will 3rd party advertising be allowed? Signage is a sensitive issue and digital signage even more so. The plan needs to carefully contemplate digital signage location, size, content, etc.

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	Simply relying on site by site DCs will not provide the overarching guidance required.
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