



Summary of Concerns of University Heights Residents re: proposed Area Redevelopment Plan (ARP) for Stadium Shopping Centre.

UHCA Position: The University Heights Community Association welcomes moderate, community sensitive, densification in the redevelopment of Stadium Shopping Centre that is designed through the type of community-inclusive collaborative planning process to which the city has already committed itself in the MDP. The proposed ARP fails to meet these substantive and procedural planning principles. University Heights Community Association (UHCA) will therefore request that City Council defer any decision on the Stadium ARP and direct City Admin'n to collaborate with not only the developer but also with University Heights (UH) as the directly affected local community to develop a revised ARP that provides more certainty about protecting SSC's character as an Neighborhood Activity Centre. So far the expedited ARP process has not been reasonably responsive to UH and other affected communities.

1. SSC is a Neighbourhood Activity Centre under the MDP. S. 3.3 describes NAC's as "appropriate sites to accommodate moderate intensification over time, with uses and development scales appropriate to the local context and community needs." The intent of the MDP is that intensification focuses primarily on residential densification, making more efficient use of existing infrastructure.
2. However, the proposed ARP allows for densification that is primarily commercial and totally out of scale for a NAC, allowing instead an extraordinarily massive Major Activity Centre (MAC)- scale development on a relatively small site of 2.48 ha. With a Floor Area Ratio (FAR) of 3.0, the potential exists for about 800,000 square feet of development, including large office and medical clinic buildings as well as structures (including a "hotel") up to 46 metres or 14 stories in height. Such a development at SSC would represent an intensity exceeding 750 jobs and people per ha. This compares to a minimum MAC intensity level of 200 jobs/ha, whereas the NAC requirement under the MDP is 100 jobs/ha. Also, the site is accessible by just one side of one residential road).To put this degree of densification in perspective, 800,000 sq ft (and) this would be:

- About 1250% more developed floor area than the existing SSC development of 64,000 sq ft consisting of only 1 story retail and restaurant units.
- About 300% larger than the 270,000 sq foot development that the UHCA successfully appealed at the Subdivision and Development Appeal Board in 2008.
- Equal to 83 percent of Market Mall floor area, on 20% of the land area of the Market Mall site!
- Larger than the newly proposed 58 story, 750, 000 sq. ft. downtown Telus Tower.
- About 280% more intense (750 jobs and pop/ha) on the very small, MAC-surrounded SSC site (2.48 ha) than the density (260 jobs and pop/ha) for development on the large 160 acre West Campus site.

In short, this proposed ARP effectively circumvents the MDP by, in effect, reclassifying the SSC site from a small NAC to an immense MAC without a formal land use reclassification. Nor was this the intent of the South Shaganappi Community Area Plan.

3. The ARP for SSC does not address the Unique location of University Heights: UH is already more densely developed than 125 of Calgary's 150 "Established Communities". And unlike these other established communities", the small community of UH is surrounded by heavy traffic generating MAC's : to the south, across 16th Ave, Foothills Medical Centre, (14,500 employees); to the west, Alberta Children's Hospital and the West Campus of U of C with 900,000 sq ft of planned development; to the north, main campus of U of C (9,000 employees and 31,000 students); to the east, McMahon Stadium and Foothills Athletic Park. Moreover, many of these MAC's are undergoing large expansions: the Baker Cancer Centre directly across from SSC; the U of C; and the Foothills Fieldhouse / soccer sportsplex with a 10,000 stadium capacity. These MAC's form the city's largest employment centre with the exception of downtown Calgary and generate immense traffic congestion on 16th Ave. NW, creating near capacity failure at the key intersection of 16th Ave and Uxbridge Dr. Furthermore, a huge amount of vehicle short-cutting occurs through UH by drivers wanting to drive to a MAC without having to deal with the clogged intersections in this congested region. Even more traffic is brought into UH by non-residents bringing their children to the two schools in the community, parishioners attending services at our two churches, and patrons of the popular retail stores and restaurants within or adjacent to SSC. Moreover, although TransCanada Highway/16th Ave brings much additional traffic to the UH area, the SSC site is not "on" this thoroughfare in that there is no entrance from or onto 16th Ave from the site. Instead, very significantly, the site is only accessible from Uxbridge Drive which is a mere residential street rather than a collector street.

UH is also a community with no community hall and where Stadium Shopping Centre (the community's only one) has always served as the quintessential type "urban village core" and community "heart" that so many Calgary planning documents are committed to preserving during densification programs.

4. The proposed ARP fails to give adequate attention to these unique contextual features of the proposed SSC Redevelopment in several ways, including the following:

a) The Transportation Impact Assessment (TIA) upon which the ARP relies, is seriously flawed by utilizing the "standard" traffic assumptions of city-wide traffic studies and the regional macro-model instead of utilizing a micro-model that is sensitive to the unique traffic situation facing UH and the subject site. The authors of the TIA further weakened its reliability by generally relying on 7 year old traffic data, by doing very few and brief traffic counts within UH during unrepresentative periods. UHCA believes there are serious concerns with the TIA that need to be addressed prior to relying on its conclusions. A key concern is the intersection of 16th Ave and 29th St/Uxbridge Drive, so important for accessing Foothills Hospital as well as UH. It has been identified as presently at failure and, despite planned small upgrades, it will again be put in jeopardy by the cumulative traffic impacts of the SSC buildup this ARP allows combined with other large planned developments nearby, such as the new Baker Cancer Centre and West Campus.

b) The ARP suggests that the traffic generated by the SSC redevelopment will be less than a standard development of this size because it is a Transit Oriented Development (TOD) when it clearly is not. Unlike the recent Brentwood ARP, the site is not on an LRT line (the nearest LRT Station, Banff Tr, is over 1 km away) and it has no Bus Rapid Transit (BRT) servicing it. The SSC site area is served only by basic bus service which has low usage because of its infrequency and slowness. Recently Calgary Transit (Route Ahead) indicated it ranked investments in transit along 16th Ave as having lowest priority amongst its options.

c) The ARP suggests that the traffic generated by the SSC redevelopment will be less than a standard development of this size because it is a mixed use development. Unfortunately, because the development is primarily commercial and not residential, the gains from people walking and cycling to work will not be realized. To achieve these suggested trip reductions UHCA would like the ARP to specify that a minimum of 50% of the developed floor area be dedicated to Residential use. This would help this sector of the city by providing more homes close to existing (MAC-related) employment opportunities while supporting and reinvigorating University Heights, thereby achieving a more appropriate balance in the ARP's responsiveness to the needs of the affected communities and the surrounding institutions.

d) The ARP envisages a massive amount of additional (and inordinately large and tall, at 46 m) commercial buildings on the SSC site despite the many institutional and commercial MAC's surrounding it. This commercial development will take the form primarily of (very high traffic generating) medical clinics and offices as well as retail units to replace what will be lost. In contrast, the ARP is silent about the floor size of the development's hotel and residential (favoured by UH) components. By also being silent on what type of land uses will be the first rather than possible future phases of the development, the ARP fails to provide the required type of reasonable direction to the developer and certainty to UH.

e) The ARP fails to require prior completion of required infrastructure for the redevelopment to proceed. The TIA identifies fourteen intersection and public transit infrastructure enhancements that it states must already be "in place" if the traffic impacts of the proposed densification of the SSC site are to be accommodated. . UHCA feels the ARP fails the community in not articulating limits to the amount of floor area that can be developed based on the amount and effectiveness of the various required infrastructure upgrades identified in the ARP. This admission is particularly significant in view of the immense impact and costly damage to City property and infrastructure caused by the unprecedented flooding that occurred in June 2013. City budgets have to be allocated to prevent or mitigate a "flood" of river water or project-generated traffic, and hence completion of required infrastructure prior to any redevelopment is essential for protecting the broader public interest.

5. During the development of this proposed ARP, UHCA has not experienced meaningful information-sharing, consultation or responsiveness from City Administration in the course of its closed door collaboration with the developer. Both City Administration and the developer have rejected UHCA's formal request for the kind of community-inclusive collaborative planning process that the City committed itself to in the MDP. Two unfortunate consequences flow from this failure to include UH in the collaborative process. First, the relevance, reliability and credibility of the allegedly supporting evidence in the proposed ARP (and TIA) is greatly weakened because the local residents possessing valuable local expertise were not allowed to be involved. Secondly, this "due process" failure has resulted in a planning process that is polarized, adversarial and publicly unsupported, not "orderly and economic" . The risk is that the avoidable existing contentiousness regarding the ARP, if not fairly addressed, will extend to every future step in the development approval process for the SSC site.