

## RCA Comments

Section	Comment or Change	Rationale
<b>INTRODUCTION</b>		
Introduction - Reasons for Amendment	requirements for an ARP change include a "comprehensive Traffic Study completed in consultation with the community and City's Transportation Department."	the Traffic Study was completed by Stantec and approved by City Transportation Department prior to community consultation. Since that time, and at best, we have expressed concerns about the TIA but it is unknown whether these concerns were considered; we have had very little feedback.
Introduction - Site Description	To the north <b>and west</b> of the site is the residential community of Ramsay ...	Correction of Error
Introduction - Site Description	The Site is 2 kms from the Downtown which lies to the North <b>West</b>	Correction of Error
Introduction - Current Proposal	page ii - add bullet: demolition of historic building presently occupied by F & D Scene Changes	the demolition of this building is contrary to the existing Ramsay ARP which identifies that this building should be adaptively re-used
Introduction - Existing Policy	Addition at end of section "Section 3.3.3.5 further goes on to express that difficulties may be encountered when considering residential land use adjacent to other land uses (industrial) and the interface with the CES lands poses such a difficulty now."	Completeness and highlighting an important issue.
Introduction - Existing Policy	Page iv, second paragraph states, "As part of the adoption of the ARP". I'm not sure if a bylaw is adopted. It may be more correct to use the term "approval".	Policies and procedures are adopted from others as a quick way to get formal documentation in place. ARP's are bylaws that undergo formal legal process to become law
Introduction - Project Evaluation	Page iv, 2nd bullet, revise: The majority of current office uses in Ramsay are associated with industrial, <b>arts</b> or other commercial uses.	a number of the buildings within Ramsay are used by artists, e.g. Burns Visual Arts Society, Co-op Feed Mill, etc
Introduction - Project Evaluation	Page iv, Bottom - What is meant by "Sensitive Intensification" and which city document describes this concept.	clarity and understanding
Introduction - Project Evaluation	Page v, adverse impacts paragraph - add " <b>Calgary Exhibition and Stampede interface.</b> "	CES interface is a huge issue that needs to be resolved
Introduction - Project Evaluation	Page v, While the form of the development ... to the north <b>and west</b> , the issues ...	any development needs to consider the residential dwellings to the west in addition to those to the north
Introduction - Project Evaluation	Page v, three bullets at bottom. Add " <b>Calgary Exhibition and Stampede land use.</b> "	any change in land use and the ensuing development needs to consider the CES interface to the south
Introduction - Project Evaluation	Page v, Bottom - The 3.25 FAR comparison to the other land use in Ramsay is not clear enough in expressing the density of the proposed site. The 3.25 FAR is over the entire site and does not account for land area used for Roads. The FAR of the existing site is likely calculated based on the developable land only and not street areas.	Which site is this comparison made to?
Introduction - Project Evaluation	Page v, last paragraph - ... This is over three times the density that is allowed under the existing land use designation and approximately 33% higher than any other land use designation in the Ramsay Community.	What is the building/address of the site referenced in this comparison? Perhaps it would be more reasonable to reference representative or average conditions within the existing community rather than an upper bound.
Introduction - Project Evaluation	Page vi - Factors that have been considered in evaluating the amount of development include:	There is no accountability in this statement. Suggest revising, "Factors that have been considered by The City of Calgary consultant in evaluating the amount of development include:"
Introduction - Project Evaluation	"The Ramsay Exchange site is contaminated ... and is unlikely to occur <b>at this time</b> without a suitable increase in development potential."	

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Introduction - Project Evaluation	Page v, 2nd paragraph. ... "suitable increase in development potential."	what is "development potential"? If it is cost, just say cost.
Introduction - Project Evaluation	Page vi - ...so as to minimize shadow impacts on the adjacent single family area.	existing shadow policies were developed for shadowing on public pathways. These policies need to be more stringent when the shadows impact existing residential development.
Introduction - Project Evaluation	Page vi - TIA accepted by Transportation Planning	Transportation Planning accepted a flawed TIA.
Introduction - Project Evaluation	Page vi - ... and will result in traffic volumes above the environmental capacity on Spiller Road. This a <b>significant</b> concern to the local community.	add "significant"
Introduction - Project Evaluation	Page vi - TDM paragraph: "limit the amount of parking provided for residents of the proposed development."	removing on-site parking will force Ramsay Exchange residents to park their vehicles on the streets of existing community. This is not acceptable as parking is already a problem. Like any development, this development should have its parking on site.
Introduction - Project Evaluation	Page vii, last paragraph concludes that the land use is "appropriate" and recommends accepting the ARP amendment with conditions	this is premature as major issues such as contaminated lands, traffic, green space, CES interface and Ramsay Community concerns have not been addressed. This is a huge development (~\$1.2 billion) that if not handled carefully may not be sustainable. It could also destroy the existing community. Slow down and do this right!
Introduction - Attachment A	1.3.4 indicates that a goal of the ARP is "To maintain and enhance the viability and <b>character</b> of the community as a low density residential neighbourhood.	If the amendment allows for the levels or types of intensification currently expressed I don't believe that this goal of the ARP will be met. High Rise buildings are not in keeping with the character of a low density residential neighbourhood.
Introduction - Attachment A	1.3.7 indicates that a goal of the existing ARP is to mitigate traffic from commercial/industrial/major event on residential areas	The existing proposal and the traffic study provided has not accomplished this goal. Capacities sited in the TIA are still contested by the RCA and no consideration about event traffic has been noted. Access to residential areas from the interior of the site does not support this goal.
Introduction - Attachment A	1.3.7 ... Adverse commercial/industrial/major event generated traffic and parking impacts on residential areas.	This present TIA only considers Ramsay Exchange's perimeter roadways. There has been no consideration to the existing community, not to mention superpositioned special events traffic. This shortcoming will affect the quality of life of both the existing residents and new residents.
<b>Draft ARP</b>		
General	FAR needs to be defined in the ARP if it is going to be referenced. FAR is the Floor to Area Ratio and is generally considered to be the developed floor area in a development divided by the ground area. Specifically the developed floor area includes all floor area of all levels of a development including parking and mechanical space and the ground area is the developable parcel not including the street and sidewalk space.	Lack of clarity of this term could lead to major misunderstandings for all parties. A firm definition is required for clarity.
Italics at beginning of Amendment	Add words:"This proposed amendment <b>shall only</b> be considered in conjunction with that application".	Use of words to ensure the Amendment attaches to this specific proposed development and no other.
3.3 Vision	perspective	add paragraph to the effect: "This ARP amendment was prepared in response to a land use proposal by Torode Commercial who purchased the property in 2006. Should Torode's proposal be rejected, then the 1994 Ramsay ARP will again govern the Ramsay Crossing (Saddleview Industrial) site."
3.4.1 Mixed use Development	Good paragraph	Well expressed.

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3.4.2 Development Density	"with the highest density located in the <b>eastern side</b> of the southern portion of the site"	Concerns for shadowing the Elbow river and adjacent neighbour and the consideration of TOD and the proximity of the future east leg LRT Station at the CrossRoads should be considered. Height and density should increase moving south and then from west to east.
3.4.2 Development Density	2nd Parag. Add sentence to the end of the existing paragraph, " <b>The maximum height and occupancy density should be located to the south-east portion of the site.</b> "	To mitigate height, massing, shadowing, overlooking on existing community interface.
3.4.3 Site Layout	" a high quality pedestrian environment on both sides of <b>every street</b> "	Addition for clarity of the guiding principle. It may not be possible in every case. To ensure consistency of built form and to support pedestrian movement within the site.
3.4.4 Heritage	add sentence...e.g. Partial retention of the Blue Whale Building <b>and the historical artefacts within the F &amp; D Scene Changes building, e.g. riveted boiler.</b>	there are a number of architectural and mechanical artefacts that should be retained by the developer or the community
3.4.5 Public Realm	well-written and further supports pedestrian and cyclist movement throughout the site.	On-street parking creates a buffer between moving vehicles and pedestrian realm - as per diagrams. Also slows down through traffic.
3.4.7 Parking Strategy	Good paragraph	Again supports on-street parking
3.4.8 Inter-connectivity with Ramsay community	Good paragraph	Language makes it possible to insist on restricting access to 24th Ave. and Spiller Rd. north of site.
3.4.8 Interconnectivity with Ramsay Community	"These links shall be located so as to discourage traffic moving through the community of Ramsay"	How is this possible to design to discourage when the scope of the development and the traffic study only focuses on the immediate site?
3.4.8 Interconnectivity with Ramsay Community	Add/change words: "These links shall be <b>used only by facilities physically located directly on 24th Avenue and shall not provide access to underground parking utilized by developments on the interior of the site</b> so as to discourage traffic moving through the community of Ramsay"	As it is impossible to discourage the path of traffic after it leaves the site the access from these points should be limited to those adjacent to 24th Avenue to accomplish this goal.
3.4.9 Interface with Stampede Park Operations	"Buildings and uses on the <b>western and</b> southern edge of the site..."	correctness. The perimeter interface with stampede extends to the western edge also.
3.4.9 Interface with Stampede Park Operations	...ameliorate potential impacts of the Stampede operations on activities within the site.	"ameliorate" is too vague. This issue needs to be resolved prior to the change in land use being awarded.
3.5 Plan Concept	Page 4 ...primarily single family community to the north <b>and west.</b>	there are existing residential dwellings to the west.
3.5 Plan Concept	Page 4, Bottom - "up to 275,000 square meters of development. <b>This figure is based on the Stantec TIA prepared for the applicant</b> "	This source of this number should be noted as being based on the traffic study. The RCA has raised issues with the traffic study that have not been addressed and resolved. This aspect is critical and must be resolved prior to any firm number of development area is granted or accepted.
3.5 Plan Concept	Page 5, 2nd bullet - add sentence, " <b>The existing community has a number of seniors that have resided there for a number of years. Many of these seniors have expressed a desire to remain in the community.</b> "	self explanatory, community context
3.5 Plan Concept	First bullet p.5 - change wording " provision of a <b>minimum of 1,000 up to a maximum of 2,000 residential units in a variety...</b> "	Ensures a minimum # of residential housing units, which is the most beneficial aspect of the development to the existing community. (Advice from planning professional)

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3.5 Plan Concept	Second bullet p.5 - change wording "Residential units <b>shall</b> be designed to meet a range of economic and social needs..."	Using " <b>shall</b> " to replace " <b>should</b> " will provide more certainty of use.
3.5 Plan Concept	5th bullet p.5 - add words "Appropriate integration with the existing community with both density and height increasing from north to south <b>and west to east.</b> "	Reinforces the community context, tower placement and shadowing issues with the existing community.
3.5 Plan Concept	Page 5, Middle - add words: "Low density residential ...Dominion Bridge building which will be maintained. <b>Residential development on 24th Avenue SE and Spiller Road shall be limited to a height equivalent to the exiting residential streetscape which is 10m maximum.</b> "	Height directly across from existing homes should be equivalent to the exiting streetscape. Any increase in height of the interface immediately on the perimeter will have a large impact of shadowing and visual impact.
3.5 Plan Concept	Page 5, bottom - "Building Form and height south of the low density residential use area gradually increasing from <b>low to medium rise formats, the use of high rise formats would impact the character of the existing community and should be avoided.</b> "	The need for high rise format buildings is not required to meet the density of the project and would be in conflict with the goals of the existing ARP.
3.5 Plan Concept	Page 5, bottom - "Building Form and height south of the low density residential use area gradually increasing from <b>low to medium rise formats. The use of high rise formats would impact the character of the existing community and should be avoided.</b> "	The need for high rise format buildings is not required to meet the density of the project and would be in conflict with the goals of the existing ARP. In addition, the high rises will cause shadowing to the existing residential dwellings and limit their ability to collect solar energy.
3.5 Plan Concept	Page 5, bottom - "Commercial activities being concentrated in the central part of the site <b>to the south of the dominion Bridge Building.</b> "	Clarity as it is believed that this is the intention. Commercial is not intended to be directly adjacent to the existing community.
3.6.1 Policies	"The Maximum amount of development that may be approved on the site is <b>XXX,000</b> square metres.	The Stantec TIA is still contested and unresolved.
3.6.1 Polices	GFA	define GFA
3.6.1 Policies	p.6 "Any density in excess of <b>60,000</b> sq.m of built area in area 4 of Map B must earn that density by the provision of bonus features as per Section 3.13'	Lowering the density bonus trigger point <b>from 91,000 to 60,000</b> will ensure community benefit at an earlier stage of the buildout. (advice given by professional planner)
3.6.1 Policies	Page 6, Bottom - "No individual block may be allocated less than the equivalent of <b>2 FAR</b> of development potential."	Minimum density should be at least two stories of the full area. Less variability in FAR means the density is spread out around the site.
3.6.1 Policies	Page 6, Bottom - "No individual block may be allocated more than the equivalent of <b>5 FAR</b> of development potential."	Maximum permitted density should be reduced to more reasonable levels to discourage the use of high rise format structure that will affect the quality of life of the existing neighbourhood.
3.6.1 Policies	Page 7 - Spine Road	The spine road should align with 26th Avenue, and ideally, it should connect with 25th Avenue.
3.8.1 Site Design	Change word: "New development within the site <b>must</b> be designed and sited to contribute to the creation of pedestrian-oriented precinct."	Using " <b>must</b> " to replace " <b>should</b> " provides greater certainty of use
3.8.1 Site Design	"...contribute to the creation of pedestrian-oriented precinct."	This is not consistent with the existing TIA that recommends pedestrian movements across Spiller Road be limited in favour of vehicle movements. The residents of Ramsay Exchange should have safe access to the Elbow River pathway system.
3.8.1 Site Design	Page 8, Top - "Maintain Sunlight Penetration to streets and open spaces"	What is the intention here? Enough sun to melt the ice or 60 seconds of sunlight a day from between tall structures. The quality and amount of sunlight should be clarified.

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3.8.2 Policies	Page 9 - 1st bullet; change words - " <b>minimum commercial and residential</b> setbacks from the edges of the sidewalk..."	change ' <b>maximum</b> ' to ' <b>minimum</b> ' and use the upper bound 3.0 m to be consistent with the existing low density residential neighbourhood, i.e. Better integrate this development with the existing community.
3.8.2 Policies	Page 9, Bottom -add words: "Night time accent lighting is encouraged on building elements above 15 storeys <b>provided it is low intensity so as not to create ambient light pollution and ambient illumination. Impact on residential units shall be minimized.</b> "	Stampede grandstand lighting has created problems for adjacent residents. Light pollution and ambient illumination are ongoing problems in the community that should not be repeated.
3.8.2 Policies	p.9 "Night time accent lighting is encouraged on building elements above 15 storeys."	Concern about light pollution from site.
3.8.2 Policies	Page 9, Bottom - add/change words:"Tall building elements and massing <b>shall</b> be organized in a way that maintains sunlight access, indirect daytime lighting and sky exposure <b>for developments on the RES site</b> through the majority of the day <b>and for residents adjacent to the RES site through the entire day.</b> "	Clarity of applicability. Day in question is Equinox. No impact to adjacent residents should be maintained.
3.8.2 Policies	Page 9 bottom - Tall building elements and massing should be organized in a way that maintains sunlight access, <del>indirect daytime lighting</del> and sky exposure through the <del>majority of the day.</del>	revise as noted to include expressed concerns of adjacent residents
3.8.2 Policies	Page 9, Bottom - add bullet:" <b>Buildings with surfaces that can cause sun glare or reflection shall be organized to prevent the reflection of sunlight on to existing adjacent residential units</b> "	Consideration for sun reflection and the nuisance it may cause.
3.8.4 Policies	p.11. "New development <b>shall</b> be designed in accordance with the principles of..." "The following factors <b>shall</b> be considered..."	Using " <b>shall</b> " to replace " <b>should</b> " provides greater certainty of safe design elements.
3.8.4 Policies	Page 11, Middle "Maximizing sun exposure..."	This may prove to be very difficult considering the proposed heights and location of taller structures is in the south portion of the site.
3.8.4 Policies	Page 12 middle - "The average species rating..."	What is "average species rating"?
3.9.1 Shadow	p.12. "It is not feasible to develop Ramsay Exchange in a manner that will not cast any shadows upon the adjacent residential area."	Request this statement be removed. It is not true. It is quite easy to place buildings and cap heights to prevent shadowing, it just lowers the profit potential for the developer.
3.9.1 Shadow	Page 12, Middle - Replacing "it is not feasible ...Adjacent residential area." with " <b>During the winter months any structure will cast a long shadow. The impact of any new structure developed on the RES shall limit the shadowing on adjacent residential areas during these winter months, from the fall equinox to the spring equinox. Shadowing during this time shall be intermittent where possible</b> "	This statement adds value to the document and better expresses an intention instead of expressing a fact that may be misleading on concluding.
3.9.1 Shadow	Page 12, Middle "It is not feasible to develop Ramsay Exchange in a manner that will not cast any shadows upon the adjacent residential area."	This statement is biased toward the developer and the existing conceptual plan. As a starting point, the shadows from the existing structures should be determined and compared to those provided by the proposed land use. In terms of quality of life, this is most critical in the winter (e.g. 21 December) and should be used as reference datum.

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3.9.1 Shadow	Page 12, Bottom - "... and limit building heights by using a shadow <b>policy</b> related to ..."	This is a policy and not just a guideline.
3.9.1 Shadow	Page 12 bottom - ... "shadow guideline related to a six hour window on the equinox."	This statement is biased toward the developer and the existing conceptual plan. As a starting point, the shadows from the existing structures should be determined and compared to those provided by the proposed land use. In terms of quality of life, this is most critical in the winter (e.g. 21 December) and should be used as reference datum. Furthermore, the City has recently circulated planning documents on solar collectors. How does this type of documentation jive with shadows from new development? Are the rights of existing landowners being sacrificed? Has this been addressed?
3.9.2 Policies	Page 13, Middle - "No building shall cast a shadow on any area <del>for more than 60 minutes</del> between the hours of 10:00 AM and 4:00 PM MST ..."	Every land owner should be entitled to uninterrupted sun exposure during the entire equinox. Sunlight will likely become increasingly important and valuable as a heating and electrical generating resource and adjacent residents should be allowed to maintain the sun expose they currently have.
3.9.2 Policies	Page 13, Middle - " <b>The cumulative impact of all buildings shall be limited to no more than 60 minutes of shadow on any one area</b> between the hours ..."	If shadowing will be allowed the impact should be limited.
3.9.2 Policies	Page 13, Middle - "No building shall cast a shadow on any area, <b>where area is defined as any part of a singular titled land</b> , for more than 60 minutes between the hours of 10:00 AM and 4:00 PM MST on	definition of the area to be affected.
3.9.2 Policies	Page 13, Middle - "No building shall cast a shadow on any area for more than 60 minutes between the hours of 10:00 AM and 4:00 PM MST on	This needs to be revised to consider the cumulative effects of all buildings. Furthermore, the use of 21 September rather than 21 December does not consider 'worst case'. It is understood that this policy originated for downtown hi-rises casting their shadows on the pathway. This policy should not be adopted for this development as there is an existing low density residential neighbourhood across the street.
3.9.2 Policies	Addition to Page 13 - " <b>Any titled land affected by shadowing of any amount on the equinox shall be permitted to develop the height of structures on the land to a height that allows unobstructed sun exposure for the entire duration of the day of the equinox.</b> "	Residents should have the right to capture the sunlight resource that would have otherwise been available to them. The increase in developed area would also meet the goals of the development in increased density.
3.9.2 Policies	Add text: Page 13, Middle "... lands lying to the north <b>of the north curb</b> of 24th Avenue SE or west <b>of the west curb</b> of Spiller Road..."	Definition of the boundary to be respected.
3.9.2 Policies	Change word: Page 13, Bottom "Notwithstanding the above shadow <b>Policy</b> no individual..."	This is a policy and not a guideline. The intention is that the policy shall be followed and not just used a guide.
3.9.2 Policies	change text: Page 13, Bottom "...no individual building shall exceed <b>50</b> meters in height."	A maximum height needs to be described
3.9.3 Interface with Stampede Park	add words: "These uses have the potential to create noise, odours, <b>dust, insects and airborne pathogens</b> that could impact the users of the Ramsay Exchange lands."	This level of detail is important to specify on interface potential human health risk problems.
3.9.4 Policies	change words "Such study shall determine if there is any potential <b>human health risk</b> exposure on the Ramsay Exchange site..."	Important to use terminology specific to CHR to include more than odours.

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3.9.4 Policies	Page 13, Bottom - "Such study shall determine if there is any potential <b>health risk including odours, insects, particulate, etc.</b> on the RES..."	Scope of study should include any health risk and not just odours. Insects associated with the possible CES uses should be considered as it is already a current problem with the existing interface between CES and residential.
3.94 Policies	delete " <b>or the Stampede lands. In the case of the latter...implement such measures.</b> "	This interface is not the Stampede's problem. Their permitted land uses are approved by Council already.
3.9.4 Policies	Page 14, Top - "Prior to approval of the subdivision..."	This is certainly a good idea to notify people of the potential risk but it does allow for a time bomb situation where later on the CES wants to develop and residents could potentially have accommodations that are not inhabitable. Resolution of interface problems with CES should be concluded now and not put off. We do not want Ramsay to be another Lynwood!
3.10 Policies	change words 2nd bullet: "Street furniture, lighting, signage and landscaping <b>shall</b> be oriented towards the pedestrian"	Using " <b>shall</b> " to replace " <b>should</b> " provides greater certainty of design and use.
3.10 Streetscape and Open Space Design	Page 14, 2nd bullet" Revise to preclude "campers" from inhabiting the street furniture and public spaces.	This matter should not be left to 'enforcement'.
3.10 Streetscape and Open Space Design	change words bullet 6. "Small plazas and places open to the public <b>must</b> have clear and legible public access..."	Using " <b>must</b> " to replace " <b>should</b> " provides greater certainty of use, especially as it relates to precious public open space in the development.
3.11 Heritage	Page 15, "Another significant building is the Blue Whale ... houses a large gantry crane."	The Blue Whale was constructed in 1975 and is a simple steel structure with sheet metal cladding. It houses a common gantry crane. There is no heritage here. In contrast, the F&D Scene changes building has much more historic architecture and houses an early 1900's riveted boiler - this is a very significant artefact.
3.11 Heritage	Delete Parag.3 "Another significant building is the "Blue Whale"Building which dates from 1975...."	Significant in size; what is it's heritage value? Does this mean that Stampede barns built in the same era can have heritage status?
3.11.1 Policies	Page 15, 3rd bullet, "That consideration be given to retention of the overhead gantry crane."	It is the developer's prerogative to salvage and reuse existing structure. This statement is silly under the Heritage heading as a 1975 gantry crane is common as wheat chaff. The riveted boiler in F&D is far more historical.
3.11.1 Policies	Delete bullet 4 "That consideration be given to the retention of the overhead gantry crane..."	Making a purse of a sow's ear. This policy gives too much weight to the retention of an ugly, ordinary building and its contents.
3.12 Transportation and Parking	Add to parag. 2 " <b>Intersection design at Exchange Rd. and Spiller Rd. must prevent Ramsay Exchange vehicular traffic from exiting northbound and entering southbound. ie: no right turn OUT. No left turn IN.</b> "	Intersection design elements must be policy if they are to be implemented with any consideration for the existing residential community.
3.12 Transportation and Parking	Parag. 2 change order of words "This road must be designed to accommodate <b>pedestrian, cycling, shuttle transit and vehicular movement.</b> "	Important to prioritize traffic modalities according to Sustainability Principles and soon-to-be Plan It Calgary policy.
3.12 Transportation and Parking	Page 15, Bottom; add: - "All other roads within the site intersect with Exchange Road <b>for the movement of pedestrian and cyclist traffic but not necessarily for vehicular.</b> "	creating through ways for vehicular traffic from Exchange road to 24th avenue promotes shortcutting through the community and should be avoided, unless mitigated by intersection controls.

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3.12.1 Policies	Page 16, bullet 2; add: - "A maximum of two additional local street connections may be made to 24th Avenue SE ...These connections shall be designed to <b>prevent the movement of vehicular traffic from the spine road to 24th avenue SE while maintaining pedestrian and cyclist connectivity. Access from 24th avenue should be limited to residents of developments immediately adjacent to 24th Avenue and should not be access for parking facilities (above or below grade) servicing the developments on the interior of the site.</b>	Removing vehicular connectivity prevents northbound traffic from penetrating the Ramsay community interior and encourages the use of major roads on the perimeter of the community. This is in accordance with current goals of the Traffic committee and recent improvements made by the city.
3.12.1 Policies	Bullet 2, change/add words "These connections <b>must be designed to prevent vehicles proceeding from the spine road in a northward direction on both Spiller Rd. SE and Dartmouth Road SE.</b> "	Intersection controls design must be policy if they are to be implemented with any consideration for the existing residential community.
3.12.1 Policies	Page 16, 2nd bullet; change /add: - "... These connections shall be designed to <b>prevent vehicles from the spine road from turning north onto Spiller Road. Furthermore, vehicle access to Ramsay Exchange shall be from Dartmouth Road and 25th Avenue rather than the existing Ramsay community.</b>	Intersection controls design must be policy if they are to be implemented with any consideration for the existing residential community.
3.12.1 Policies	Bullet 6 add words "...to accommodate the development <b>without changing the existing road designations of Spiller Rd.SE &amp; 24th Ave. SE as described in Section 4.3.1 of the existing Ramsay ARP.</b> "	Roadway design elements must be policy if they are to be implemented with any consideration for the existing residential community.
3.12.1 Policies	Page 17, Bottom - " Loading activities <b>shall</b> occur at the rear of buildings with suitable access provided <b>and away from residential units. Loading areas for developments in areas 2, 3 and 4 should be accessed from the exchange road network and not from the spiller road and 24th Avenue network.</b>	The development should minimize the amount of delivery vehicle traffic and the nuisance it causes to residential units on and off the Ramsay Exchange site.
3.12.1 Policies	Page 17, Top - Additional policy note on parking " <b>All parking structures above or below grade shall be accessed only by the street network connected to the spine road.</b> "	High volumes of vehicles accessing the parking facilities should be handled by the exchange road reducing the traffic impact to the existing community.
Construction	Need new section to reference Building Construction & Demolition Site Management Code of Practice and community accountability / consultation.	this is 10 to 15 year build out. That is a lot of construction including dust, noise, traffic, pollution, visual impact, etc. This should be addressed in the ARP to minimize the impact to both the existing and new communities.
3.13 Land Use Controls - Subdivision and Bonusing	Whole section way too complicated for laymen.	rewrite to improve readability and understanding by community members who will inherit the ARP amendment.
3.13.1 Policies	Page 21, 3rd bullet - "In the event of subdivision ..."	excellent paragraph as written
3.13.2. Bonusing	pp.21,22,25 Change <b>91,000</b> square metres to <b>60,000</b> square metres.	Lowering the density bonus trigger point from 91,000 to 60,000 will ensure community benefit at an earlier stage of the buildout. (advice given by professional planner). Need to ask how 91,000 derived.

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3.13.2.1 Provision of Public Amenities through Bonus System	Bullet 1 add: "Density Bonuses should only be established for items or features that provide a perpetual or enduring benefit to the community in which the density is being accommodated. <b>Level 1 bonus must include an affordable community grocery store. Level 2 bonus would accrue to the CEF.</b> "	Community amenities have not been identified or assured to date. A community-oriented grocery store (not a health food store) has been on the community's wish list from day 1. (Advice from professional planner)
3.13.2.1.3 Provision of Affordable Housing	Page 24, Bottom - Delete " <b>Further, affordable housing units...shall not be included in the calculation of gross floor area for that project</b> "	No bonusing method or other policy should obscure the understanding or calculation of gross floor area. This is a critical quantity in understanding the intensity of the development and exceptions like this can make other general discussions and policies cumbersome and meaningless. Perhaps the 75% ratio could be sweetened to enhance the attractiveness of this bonusing method.
3.13.2.3 Establishing the Average Land Value	Page 26, Bottom - The rationale used to establish the average land value should be described. Variability in the possible value greatly affects the amount of the bonus. Clarification of this process and the rationale should be documented for clarity	If a low value is used the bonusing affect is large for the investment made. This would happen if an average over the entire city was applied. A land value consistent with the immediate area of the improvement would be a more accurate quantity, for example the value of space in adjacent developments should be considered.
3.15 Environmental Remediation and Landfill Setbacks	Study of underground aquifer with respect to the effects of underground structures like the proposed parking garage on adjacent lands should be noted. A thorough study should be conducted to avoid altering the water flow underground in a way that will damage other exiting residents lands.	This is another outstanding issue that is neither captured in the draft ARP or resolved in other correspondence with the City.
3.15 Environmental Remediation and Landfill Setbacks	Page 28, 2nd paragraph - ... Site Remediation Plan and Risk Management Assessment for the site shall be submitted to the satisfaction of the Development Authority.	this plan should consider how the development may impact the existing community and have risk management measures in place to determine whether hazardous materials or ground water will egress. In simple terms, the site is contaminated and large underground structures are planned. Will these structures divert contaminants and/or ground water to the existing community? If possible, how will this be controlled?
3.15 Environmental Remediation and Landfill Setbacks	2nd parag. To date the HHRA and Site Remediation Plan are specific to proximity to inactive Manchester landfill and incinerator, not to potential contamination on entire site or land parcels on the site.	there must be another HHRA and Remediation Plan undertaken for all land parcels on the site, to ensure remediation measures are used and an exit strategy is in place in the event of unforeseen site contamination.