

Hi Giyan,

Anthem properties are proposing bylaw changes to the Erlton ARP. We have a scarcity of information available to inform the residents of Erlton what the effect of these changes may be.

I am not opposed to development but I do believe this development in particular has not been planned nor designed to meet the criteria contained in the Erlton ARP or the Municipal Development Plan. The scale of this development is incompatible with the constraints of the site e.g unsafe access off Macleod Trail and the subsequent need to divert traffic via a connecting road(25th) onto a quiet residential street (Erlton Road).

In an attempt to understand the issues I have done some reading and conducted my own limited research to try and discover how the bylaw changes may affect the neighbourhood of Erlton.

I also have many questions which to date I can find no answers to in the information Anthem and the City have provided.

1. Anthem propose to allow commercial traffic to access their development via Erlton Road.

In previous correspondence I showed that this would be a contravention of the spirit and intent of the Erlton ARP, the MDP and CTP, therefore the bylaw change should not be approved. Recapping,

Clause 2.1.3.2(v) of the bylaw says;

“To minimize the impact of the retail traffic on the residential area, private vehicle access to retail and office development shall be principally from Macleod Trail”.

And;

“discourage through traffic from Macleod Trail to Erlton Road”.

And

“Access and site circulation designed to minimize the impact on the adjacent buildings, reduce conflict with pedestrians and reduce the traffic impact in the community”.

The Interim 2011 complete streets guide says;

“Residential Streets provide direct access to abutting low and medium density residential properties. Access is not permitted to commercial properties because they are high traffic generators.”

The City Transportation Engineer has told Anthem ***“non-residential/commercial traffic should not affect residential through traffic”.***

TOD Guidelines

“Major parking areas should be accessed from collector and arterial roads around the station \areas, without impacting existing communities or the pedestrian environment closest to the station”.

There is no doubt about the meaning of the above. **No commercial vehicle access from Erlton Road.**

2. Reduction of the minimum requirement for office space.

Anthem propose to remove the requirement for a minimum office space of 0.46 FAR.

They say ***“Anthem does not want to build office space in this location based on market demand”***. Also ***“the residential space permitted is not increased due to this change”*** (Jan 6th Anthem update which did not answer the question asked whether the reduced office space will become commercial space).

Do Anthem wish to convert office space to commercial space and if so, by how much?

If the space will not be used for residential or for office it must be assumed that they intend to increase the commercial space.

Why is this important?

Because different uses generate different trip generation rates. For example (using the Institute of Transportation Engineers trip generation rates);

3000 sq ft of office space will generate 11 trips per 1000 sq ft = 33 vehicle trips per day.

If this space is converted to commercial and a 3000 sq ft fast food restaurant is introduced, the ITE trip generation rates show this will generate 2148 trips per day. An additional 2115 vehicle trips per day with access/exit to Erlton Road.

If a 3000 sq ft high turnover sit down restaurant was introduced it would still generate an extra 248 trips per day than the same area of office.

The proposed change has a potentially negative effect of significantly increasing traffic in Erlton Road if the bylaw allowing commercial traffic to use Erlton Road is approved.

Additionally office space is one of the primary transit supportive land uses(Pg 10 TOD Policy guidelines) because it provides a choice of use and is a low traffic generator.

A large grocery store/pharmacy and complimentary retail stores conversely will generate high levels of vehicle activity, are oriented towards automobile use and promote travel time within the weekday am/pm peak periods (grocery stores weekday peak use times are 4pm to 6pm). This is opposed to the goals for transit oriented development.

If Anthem wish to convert office space to retail space there will be a corresponding increase in vehicle trips in Erlton Road depending on the use.

More commercial traffic on Erlton Road is a significantly negative effect for Erlton North and the change is not in accord with the goals of transit oriented development therefore;

The Erlton ARP bylaw governing minimum FAR should NOT BE CHANGED.

Parking

If grocery store weekday peak times (4 – 6pm) are similar to office workers arriving home from work (5 – 6pm), **how will the shared parking work with residential and commercial vehicles at peak grocery store times especially if Anthem have underestimated the numbers of commercial trips to the development?**

Grocery store peak day is saturday. **How will the shared parking work when most of the parks may be taken by vehicles that have not vacated parks (eg weekday workers)?**

The residential apartments have an allocation of 1 park per apartment. **Where will guests visiting apartment owners park, and will apartment owners be given parking permits for guests to park on Erlton streets?**

From the city of Calgary design guidelines for subdivision servicing (2012) a collector road carrying less than 5000 vehicles per day but more than 1000 v/day will require the following;

21.0 m R.O.W. – 2 driving lane of 3.5 m wide and 2 parking lane of 2.25 m wide.

or,

19.0 m R.O.W.* – 2 driving lanes of 3.5 m wide and 1 parking lane of 2.5 m wide

(= 9.5m)

Erlton Road is a residential road that will assume the status of a collector road due to the proposed traffic volumes. However it only has a trafficable carriageway of 10 metres width with an overall width of 20 metres, therefore the road carriageway will need to be widened a further 1.5 metres and the overall R.O.W width to 21 metres, or parking can only be allowed on one side of Erlton Road.

If traffic volumes exceed 5000 vehicles per day as expected, Erlton Road will function as a primary collector street and overall road width will need to be increased to at least 23.5 metres, requiring land from the development to be vested as road to meet subdivisional standards.

Will parking be removed from Erlton Road if commercial vehicles are permitted to use Erlton Road?

Will the road width need to be increased to accommodate the higher traffic volumes?

Will existing trees along the eastern side of Erlton Road need to be removed in this case?

3. Increase in supermarket size

Anthem wish to increase the size of the supermarket from 2900m² (31,215 sq ft) as per the maximum allowed in the ARP to 3900m² (40,900 sq ft).

They have applied the city of Calgary's trip generation rates for this development. These are generic rates which fail to account for important characteristics of the site (e.g. very high adjacent traffic volumes, high community vehicle use, restricted access and exit locations, long delays at Macleod trail intersection).

Anthem also predict that 15% of retail trips will be internal (where patrons visit 2 or more stores in one trip). This is excessively low for this type of mixed use type of development. This figure should be around 25% and reduces the expected number of trips generated by the commercial development.

Larger supermarket/retail developments seek to attract patrons from further afield. In general for mixed use developments as proposed, the amount of traffic generated is proportional to the size and type of use.

A 40,900 sq ft store is a third larger than allowed for by the ARP and will produce approximately a third more traffic, much of this traffic from outside of the neighbourhood via Macleod Trail. This one third increase in size could convert to around 2000 vehicle trips per day (see commercial vehicle estimates below).

The bylaw change will allow this extra traffic to access the development via Erlton Road.

The development also has many of the characteristics of a community activity centre e.g. high density housing, underground parking, close to transit, (3.3.3 MDP) in a location where a CAC has not been designated according to Calgary City planning maps. CACs are intended to "represent a local destination for multiple communities".

The MDP also says that "Individual CAC densities and the appropriate job and population distributions will be established through a Local Area Plan".

Erlton has a local area plan and it does not include a community activity centre. The Erlton ARP conversely uses language that suggests a neighbourhood activity centre is appropriate for this area.

The Elton ARP says;

"Commercial uses are intended to primarily serve the local population "(policy 2.1.3.1)

and;

"One of the primary objectives is a range of local (neighbourhood) commercial uses to serve the needs of the immediate communities".

Neighbourhood activity centres discourage auto-oriented uses and designs that generate high volumes of traffic.....and create negative impacts for pedestrian travel.

Because Anthem intend to use Erlton Road as primary access for commercial and new residential traffic it is critical that we know as reliably as possible what the potential traffic impact may be.

Traffic on adjacent roads (Macleod and 25th) increases annually. Based on an acceptable 2% increase per year from the 2011 count, there will be 11,300 more vehicles on Macleod Trail and 25th Avenue in 2020 when the development is completed. Total volume on both roads 69,000 vehicles per day. The new supermarket and retail shopping will be highly visible from Macleod Trail. How many vehicles will divert into the development via Erlton Road, especially at peak times? This is hard to predict but a very important calculation for the residents of Erlton.

Traffic trip generation is notoriously difficult to predict. Every site has varying characteristics and constraints that affect how much traffic will access a development.

The most effective way of estimating trips is by measuring the trip generation of existing similar sized new developments which display as many of the characteristics of the proposed development as possible, allowing adjustments to be made based on the peculiarities of a subject site, eg adjacent traffic volumes. A study of 4 or 5 other similar developments would provide valuable information enabling a fair prediction of actual trips to be calculated.

Anthem have not provided this information. Instead the residents of Erlton North, who are most affected by the bylaw changes, have a TIA based partially based on dated information (2006 and 2010), minimal data collection, generic trip generation rates, estimations and judgement calls by TIA engineers, internal trip rates that are clearly incorrect, and a current TIA scenario that does not account for the proposed bylaw changes (I understand Anthem are reviewing their existing TIA?).

Therefore in the absence of any reliable information from the developer another method (widely used in Canada and US) to calculate traffic generated by the development must be used..

The Institute of Transportation Engineers have conducted trip generation studies of existing supermarkets in the US. Although the number of sample supermarket studies is not high (4 for weekdays and 2 for Saturdays) these rates are widely used in Canada and worldwide as a starting point for expected traffic generated by a development.

Because we currently have no reliable data an example scenario of various stores within the development is proposed using ITE trip generation rates and proposed store areas advertised by anthem.

Store area Type	ITE rate	Trips generated
40,900 sq ft sobeys grocery/pharmacy	102.24	4181
10,140 specialty retail	42.94	435
1,195 hairdresser /nail salon	14.5	17
1841 walk in bank	156.48	288
1862 coffee/donut shop	407.5	758
1830 medical/dental	36.13	66
2077 fast food restaurant	716	1487
2379 quality restaurant	89.95	214
2282 liquor store(discretionary)	147.04	335
1550 drinking place(discretionary)	113.4	176
1528 home improvement store	29.8	46
1518 Bakery	280	425
Total		8428

(Liquor store rates from NJDOT data current March 2013)

These figures do not include office space which may be converted to commercial?.

Allowances (reductions) must be made for persons that visit two or more shops per trip (Internal trips) and for transit usage (C Train/bus).

Anthem estimate a 15% reduction for internal trips in their TIA. Based on research this is excessively low and a value of 25% should be used plus a 5% allowance for C Train/bus usage for commercial.

Total reduction in vehicle trips = 30% (note: public transit usage to retail uses is significantly lower than for office and residential)

Commercial Vehicle trips

Commercial use from ITE rates = $8428 \times 70\% = 5899$ commercial vehicle trips per day.

Office

$3650 \text{ sq m} \times 11.5 = 42$ vehicle trips per day

allowing a 20% reduction for C train/bus use = 34

Total commercial vehicles accessing the development = 5933

Residential Vehicle trips

745 new high rise apartments in 4 towers.

$745 \times \text{ITE dwelling Unit rate of } 4.2/\text{DU} = 3129$ vehicles per day

Allowance of 20% reduction for C Train/bus use and 30% combined external/store trips = $3129 \times 50\%$

= 1564 new residential trips per day

The development may generate $5933 + 1564 = 7497$ vehicle trips on any given weekday able to access and exit the development from Erlton Road.

The proposed traffic signals at Erlton Road and 25th further complicate the issues. Erlton North residents entering Erlton North from Macleod will use the free turn slip lane on 25th into Erlton Road. Most traffic exiting Erlton North toward Macleod or toward downtown is likely to use Erlton Street to take advantage of the longer green signal on 25th or signal free intersection.

Traffic impact effects from new developments are not easy to predict. However for Erlton it is essential that comprehensive and reliable data and believable conclusions are presented.

Transit Oriented Development?

Anthem claim the development is “transit oriented”.

However they propose what is essentially a high vehicle trip generating grocery store offering a full range of grocery products, deli, bakery, fresh flowers, in store pharmacy and even entertaining trays for parties/events (as per Sobeys website).

They now wish to remove office space which is already minimal (will this mean an equivalent increase in retail space?)

One of the objectives of The guidelines for Transit oriented development are;

“to provide a framework for evaluating land use, development permit, and/or subdivision applications in Transit Station areas”.

Office space is one of the primary transit supportive land uses (Pg 10 TOD Policy guidelines)

The TOD Policy guidelines also say the following;

“As the focus of TOD is the transit rider and pedestrian, it is important that auto-oriented development does not overwhelm the station area”.

Is it therefore acceptable for commercial traffic to be permitted to overwhelm a quiet residential street?

“Non-transit supportive land uses are oriented primarily to the automobile and not the pedestrian or transit user”.

A 40,100 sq ft grocery store with in-house pharmacy is a huge generator of traffic. The grocery store is oriented towards automobile use because shoppers need their vehicles to carry goods.

“Major parking areas should be accessed from collector and arterial roads around the station areas, without impacting existing communities or the pedestrian environment closest to the station”

Anthem propose to divert traffic onto Erlton Road to access their retail parking areas.

They propose access off a residential street NOT a collector or arterial as required by TOD guidelines.

Pedestrian routes are “continuous and barrier-free” and “Routes are safe”.

High traffic numbers on Erlton Road create a barrier for pedestrians crossing Erlton Road to and from the stores and LRT, and create an unsafe pedestrian environment.

Ensure that building massing and shadowing impacts are minimized.

Building massing and shadowing impacts are not minimized. The new office towers are very high and will shade most of the existing residences in Erlton North at various times between 7am and 11am mid summer. In winter the road will be shaded at various times increasing the possibility of icing of Erlton road

Large format grocery stores are discouraged.

The proposed grocery store of 40,900 sq ft essentially operates as a large format grocery store.

The LRT is already operating at or near maximum capacity in peak hours discouraging transit use in am and pm peak times when workers need to use it. The new car in 2015 will only hold around 220 persons. The residential towers can hold around 1600 – 2000 persons. The C Train will not provide much relief from vehicle usage.

There will be long traffic delays on Erlton Road and 25th Ave, including buses, due to new traffic signals required by the development, long delays for east/west movements at Macleod and 25th, reduced efficiency of roads around the LTR station and increased air and noise pollution in the area.

The TOD guidelines say that non transit-supportive land uses should not be located in the immediate station area where there is high pedestrian activity and bus traffic.

Increasing the grocery store size and reducing office space contradict the Erlton ARP, the MDP, the CTP and TOD guidelines.

Commercial traffic must not be permitted to access the development off Erlton Road. A new design for access to the commercial uses is required.

The bylaws should remain as decided by the community of Erlton and the City of Calgary unless information from Anthem is provided showing an alternative access to, and exit from the development which is not from a residential street.

The TOD policy guidelines also advise;

“Local communities can provide valuable local knowledge on services and amenities needed by the community, housing forms, key pedestrian destinations, current pedestrian habits, parking management concerns etc”.

And,

“Applicants are encouraged to consult with local communities early in the planning process to ensure a common understanding of important community issues related to a particular site or area”

Anthem should contact the Erlton Community Association urgently and begin this process so a common understanding can be achieved.

As a point of interest, Sobeys have bought out Safeway in Canada. Sobeys now own the 24,000 sq ft Safeway supermarket in mission. The possible 40,900 sq ft Erlton supermarket will be less than 1 Km from Safeway mission. They will be competing for the same customers. Is this good planning and good economics? What plans do Sobeys have for Safeway in mission? Is the Erlton supermarket to be the primary traffic attracting grocery store for surrounding communities?

There are also concerns about shading of properties (and Erlton Road in winter) by the residential towers. In the absence of any information from Anthem, further communication will present shading diagrams showing shading scenarios from the towers in mid summer and mid winter.

Kind regards,

Graham Hall

(Resident of Erlton North)