



460 – 5119 Elbow Drive SW P 403.201.5305
Calgary, Alberta T2V 1H2 F 403.201.5344

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City of Calgary
City Clerk's Office
Ground Floor,
Administration Building
313 – 7 AV SE
Calgary, AB
T2P 2M5

Email Delivery:
cityclerk@calgary.ca

ATTN:

Standing Policy Committee on Planning and Urban Development Members

RE:

Draft Guidebook for Great Communities
2 October 2019 Meeting of Standing Policy Committee on Planning and Urban Development

To the Standing Policy Committee on Planning and Urban Development,

CivicWorks shares this letter directly with Committee Members given the importance of the Guidebook for Great Communities (Guidebook) and the role it will play within an emerging new planning system for Calgary.

CivicWorks commends Administration and the Guidebook team for the tremendous effort, considered process and quality of stakeholder engagement undertaken to prepare the current draft of the Guidebook.

CivicWorks is supportive of much of the content and progress that has been made in a number of areas in this iteration of the proposed Guidebook; however, we have concerns that further improvements are required to maximize the opportunity for this to be an effective city building tool. The Guidebook will be used by many stakeholders and become the foundation stone on which we build all future Multi-Community Local Area Plans and the new Land Use Bylaw. While perfect shouldn't get into the way of good enough, CivicWorks is concerned the Guidebook is not ready to be deployed.

The proposed Guidebook is a 150-page document with many important layers that could be unpacked for detailed discussion. In the interest of being focused and concise for Committee Members, we provide a key observation:

Clarity of Understanding, Intent, and Practical Translation of the Urban Form Classification and Policy Modifier System

As described in the proposed Guidebook, we question the value, average user understanding, and practical translation of intent when using such a nuanced system and in particular, the use of three activity levels (Major, Minor, and Local), all of which can employ a range of Policy Modifiers.

As a particularly illustrative example, we struggle to understand the practical value and implementation differences of having both Neighbourhood Housing Local and Neighbourhood Commercial Local Urban Form Categories, and where additional Policy Modifiers can be applied to add further shades of meaning and interpretation (like Commercial Cluster or Vehicle-Oriented). As described in the draft Guidebook and in terms of practical implementation, these two Urban Form Categories could



produce the same land uses and built form (both could yield a small convenience retail store, for example).

Another illustrative example would be the difference between the two Policy Modifiers described as Comprehensive Development Site and Future Planning Area. The nuanced difference is almost imperceptible to an expert audience, so how would it be perceived or bring meaning to the average stakeholder and be practically implemented.

For us, questions start to arise, like:

- What will be the variation in understanding and meaning to stakeholders when Urban Form Categories and Policy Modifiers are applied through a Multi-Community Local Planning process – will stakeholders see policy translate into the outcomes they expect or need?
- What will be the variable range of Land Use Districts deemed appropriate (or case made by Applicants) under the existing or new Land Use Bylaw—will the translation between the Urban Form Category and applied Land Use District result in the outcome intended?

To maximize the opportunity of the Guidebook and to be solutions focused, CivicWorks suggests Administration take more time to merge stakeholder engagement and review of both the proposed Guidebook with the first draft Multi-Community Local Plan (North Hill). This provides an opportunity to demonstrate, ask questions, and test links between policy and intended outcomes. Among other detailed aspects of the draft Guidebook, hard questions need to be asked about the intended meaning, practical translation, and fundamental value of having such a nuanced Urban Form Classification System.

Thank you for your time and consideration.

Sincerely,
CivicWorks Studio



September 25th, 2019

Planning and Urban Development Committee

Re: The Guidebook for Great Communities (formerly The Developed Areas Guidebook (DAG))

The Federation of Calgary Communities (the Federation) is the support organization for over 230 community based non-profit organizations, including 151 community associations. We advocate for and assist community associations in navigating Calgary's planning process. We thank the DAG Team for incorporating us in this process. We know that this is a huge undertaking and requires a change not only in internal processes but in how Calgarians will see their City grow and change. While it is exciting, it also cannot be implemented without creating a shared vision for how it will build great communities for all. For this, we are requesting more time be given for broader public engagement, revision and learning. Specifically, we have concerns in the following areas:

Engagement

Engagement was limited for this project. We appreciate that administration used a variety of engagement data from previous inner-city engagement sessions. Unfortunately, participants were not always aware that the data they were providing would be used to develop a new planning system. There should be a broad round of circulation with opportunity for feedback to ensure that feedback from other projects was not taken out of context. Further, although the stakeholder group included members from a few communities, there has been very limited consultation purposefully for this project with the average Calgarian, and yet the status of the document is now "proposed". A policy document with this much authority should be widely circulated before being presented as proposed. Broader engagement should have taken place, seeing as this document is driving changes to the MDP.

Consistency and Terminology

There are new concepts, policies and definitions in the Guidebook which are not in the MDP. The Guidebook is not written in plain language. It is extremely complicated. If we are building Great Communities for all, should we not have tools that are written in plain language? At this stage, we need a detailed communication plan around how the Guidebook will be implemented, how changes to it will occur, and how related work will tie into it in the future.

Status of Implementation Tools / Related Projects

The Guidebook is supposed to be the implementation tool for the MDP, but the implementation solutions are still being explored in other projects. Although funding mechanisms for the public realm are being explored through the Established Areas Growth and Change Strategy, there needs to be strong, sustainable tools for amenities suggested in the Guidebook before we apply new density rules outlined in the Guidebook. Heritage policy solutions have been removed and put into a subsequent project, but there are concerns that the policies proposed in the heritage project may not be integrated back into the Guidebook to have the authority of the Guidebook. The North Hill Communities pilot, which will both compliment and implement the Guidebook through a new district local area plan, is still underway. The Federation is concerned about approving the Guidebook and the intensity it allows when important implementation solutions are still being explored.

T 403.244.4111

F 403.244.4129

E fcc@calgarycommunities.com

calgarycommunities.com



Unlimited Discretionary Power

The Federation has concerns with item 2.33 (b) (iv):

Amendments to a local area plan based on the Guidebook should only be considered for the following reasons:

- iv) when a planning application that conflicts with the current plan is able to better fulfill the vision of the plan and the principles and goals of the guidebook than what was previously considered or outlined.

Policies like this create uncertainty among residents and do not build trust in the planning process. This clause invalidates the work of the Guidebook itself and will create tension between applicants and communities. Further, in the event of any conflict between a local area plan and the Guidebook, the local area plan should take precedence, as local area plans have historically been a result of extensive engagement and consultation with the people who live there.

Process / Scope Changes

When the Guidebook (then the Developed Areas Guidebook) was originally introduced, it was as a guidebook, not as a statutory document with the authority of the MDP. We later learned that the DAG would be enacted through the drafting of new district local area plans created using the DAG. The Developed Areas Guidebook was only to apply to the developed areas. Now, elements of the Guidebook for Great Communities (Chapter 3) apply “to the built-out areas of Calgary, outside of the Centre City, with or without a local area plan developed using the Guidebook”. The authority, geography and implications of this document have grown with little communication about the evolving scope of the work. This Guidebook signals a new way of planning. Public engagement and education must be commensurate.

Summary

Although we appreciate the need to remove redundancies from existing local area plans and house them in one document, The Guidebook for Great Communities and related projects represent a paradigm shift in community planning in Calgary. An overhaul of our planning system without robust public engagement and education is not good planning practice. Although a local plan may be old, the principles upon which it was drafted don't fade with age. These principles become more important as neighborhoods grow, change and experience instability. We ask that The Guidebook for Great Communities be tabled for broader public discussion and a more sequential alignment with other work. A detailed plan outlining resources and timelines for communication and education is also needed.

Sincerely,

Jennifer Miller
Urban Planner

Toun Osuntogun
Urban Planner

T 403.244.4111

F 403.244.4129

E fcc@calgarycommunities.com

calgarycommunities.com