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2019.09.25

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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.

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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

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October 29th, 2019

Members of SPC on Planning and Urban Development
City Clerk's Office, Legislative Service Division
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Dear Committee Members,

Re: The Guidebook for Great Communities

The Federation of Calgary Communities is the support organization for over 230 community based non-profit organizations, including 152 community associations. The Board of Directors has been requested, by our membership, to engage in this matter as a respected and valued voice for community and as a partner in planning a great city for everyone.

We acknowledge, that Administration has done a good job of incorporating feedback from many "what we heard reports" and have applied best planning practices and their professional judgement to creating the "Guidebook for Great Communities" (Guidebook). We are not questioning their intent, their vision or confidence in their work.

From a principal base, we are in support of tools and statutory plans that establish common understanding and clear direction for all Calgarians. We believe in the work of having one plan that guides all local plans. We understand that the Guidebook will be statutory policy at the highest level. It will be the foundation of future multi-community plans, which will replace current local area plans. It will also, if passed in December, through Chapter 3, be applied across all established areas.

Our concern is that most people are not aware that the Guidebook exists. People who are aware of the document do not understand how it will affect them. This is creating doubt and worry about its advancement through the approval system.

Further, this is one of the most complex and difficult to navigate statutory documents created. It is expected that all new multi-community plans will use this plan as the foundation. The challenge; it is not accessible because of the language and complexity. Our professional planners and members, who are well versed in community planning, are struggling to understand and navigate the document. How can we expect Calgarians to understand? Further, when language isn't clear, it might result in

“subjective” application of the terms and/or disputes over the meaning. This document should help build great communities for everyone, not further divide us.

The board of the Federation of Calgary Communities, would ask:

- 1) That prior to recommending the Guidebook as a statutory document, Administration be directed to ensure they build a shared vision and understanding of the document with stakeholders through further engagement. Engagement should include testing and information sessions that are properly resourced. The only changes to be made in the Guidebook are to clarify the intent (i.e., simplify and clarify language) and to respond to “testing” concerns. This will ensure that the interest of one group or stakeholder doesn’t displace or impact the professional work of City Administration or the overall intent of the Guidebook.

- 2) That Administration be directed to articulate a clear engagement process for their statutory work going forward. This will make expectations clear to all stakeholders about when to engage, what type of engagement is required and what the outcomes of the work will be. This is a critical piece in building trust across stakeholders and managing everyone’s expectations.

We thank you for your thoughtful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Valerie Mushinski', written in a cursive style.

Valerie Mushinski
President, Federation of Calgary Communities

CC: All Members of City Council
Calgary Community Association Presidents and Planning Chairs

31 October 2019

Planning and Urban Development Committee

Re: Guidebook for Great Communities, 6 November 2019

As the Renfrew Community Association's Director of Planning and representative on the North Hill Local Growth Plan's working group, my experience with the Guidebook for Great Communities through the North Hill Local Growth Plan is relevant to this committee's discussion.

North Hill Local Growth Plan

In fall 2018 and winter 2019, the North Hill Local Growth Plan working group met to understand the planning system and to use online input to create a vision for the growth plan. In April, we had an activity looking at where we expected people would be and what activities they'd do. Essentially, it was an area map showing body heat — where many people would be moving around by many means and where few people would be. In May, we took the area map magnified so the scale worked with Lego blocks and talked about the height of buildings. In June, we reviewed specific sections of the area to go over details about activity and scale. It wasn't until our session in September when we were introduced to the Guidebook that I realized that we weren't just piloting local area plans that included more than one community, we were piloting the new Guidebook.

Those sessions from April and May make me trust the Guidebook, but I doubt I or other working group members have fully digested the Guidebook's contents. I expected the new Guidebook would add a few new forms (ideally including urban townhouses and rowhouses so we can have abundant, dense, family-sized homes) and we'd just slide some streets up the scale in the last Developed Areas Guidebook by a certain number of increments. That method might work but wouldn't produce homes for all the people who want to live in Calgary in the next generation or two. The Guidebook's method does that more effectively and allows more flexible designs than my idea or our current system.

What I don't like about the Guidebook right now

1. It's long. Could an external technical writer or editor go over it? A high school graduate with an hour or two should be able to understand the land use bylaw and have a hope of developing something. Developers shouldn't just be people who can hire consultants to work through the code and lawyers to fight through the application and appeal process. A shorter, simpler Guidebook should make it easier for many people to be small scale developers. A compact code is more likely to produce a compact city.
2. There has been talk of removing heritage policies from the Guidebook, which is concerning.

3. Our built form policy and our stormwater management policy don't seem to align with each other. I'm sure industry has pointed out other technical details where City policies disagree with each other.

4. There's a sense that there hasn't been enough engagement or acceptance of the Guidebook. Having time for more engagement and discussion so the Guidebook and North Hill go to Council together, or two weeks apart so North Hill can be updated if needed, seems to be a remedy.

What I like about the Guidebook

1. Life happens at street level. The Guidebook's focus on what happens on the ground should help us better consider trade-offs between buildings' street level design and height. I hope the Guidebook's approach allows for more lovable and durable buildings, so we see replacing aging buildings as an upward trade.

2. The parking section of chapter 3 is an improvement. Notably, the direction that parking requirements should be based on geographic location, not the type of use, should produce better local buildings and encourage adaptive reuse. A few months ago, an applicant wanted to put a restaurant with a residence above in a century-old brick building on Edmonton Trail. The current work-live parking requirement of five stalls makes parking consume as much land as the building. This is an unproductive use of valuable land. It would be better to remove red tape and let businesses decide how much parking they need. Until then, the Guidebook is an improvement because it doesn't require a building on Edmonton Trail to have as much parking as a building in isolated places.

3. Finally, the Guidebook's provision for a single low-density district will be essential in how Calgary grows while retaining abundant, attainable family-sized homes. I hope it allows for widespread incremental growth that allows families to adapt as their circumstances change. Done right, it should help us have children in neighbourhoods with schools, help our local businesses be profitable and stay open, and perhaps produce a range of unit sizes so three generations of a family can live within walking distance of each other.

The low-density district is an example of deregulation. Our current planning system doesn't prevent local redevelopment; it only ensures that existing detached homes will be replaced by larger detached homes with one door, instead of those with two or more. Allowing market-rate, attainable housing throughout the city would give us a competitive advantage over other cities like Vancouver and Toronto that, instead of a free market, believe that a detached home should only be replaced with a larger home for residents who are as rich or richer than current residents.

Our neighbourhoods may change as a result. However, those changes may be better than the alternatives. As Alex Bozickovic, a Toronto-based architecture critic, describes, "The 'character,' in the way we often think about it, will change. There will be more front doors. But the alternative is a city that shuts out new

arrivals, or shunts them into illegal rooming houses, and grey-market basements, and condos on old industrial sites. If that is the city we end up building, it will say a lot about our character."¹

We may begin to see 'stability' as many small changes on every block rather than neighbourhoods that are emptier than they were a few years or a generation ago and schools that are kept open by bussing children across the city. Parts of Renfrew show what a low-density district could look like in Calgary with multi-unit or clustered housing types that are compatible in scale with detached homes.

Today, some neighbourhoods contribute more to MDP growth goal than others because zoning prevents growth. If that continues, residents of the neighbourhoods that grow will likely want more and larger amenities, adding more public infrastructure that we won't be able to afford to maintain.

Cities are complex, adaptive systems consisting of people and land. If we're like other North American cities, we're functionally insolvent. Fortunately, Calgarians can decide what to do with our land in response to this predicament. I don't know how much private investment we're going to need or how much public infrastructure we'll have to stop repairing to balance our private-to-public investment ratio. Maybe I shouldn't be enthusiastic about what that means for my neighbourhood. However, I'd much rather have all of Calgary's neighbourhoods allowing many different types of small changes, than have Renfrew punch above our weight to get Calgary's finances in order while other parts of the city get a pass because they claim 'heritage' or 'character.' It took us decades to get here. Like post-flood clean up, it's going to take many people to get us out of this mess.

Thank you for considering my perspective,

Nathan Hawryluk

¹ <https://www.theglobeandmail.com/opinion/article-the-term-neighbourhood-character-is-a-euphemism-for-something-ugly/>