

# Community Association Letters



November 15, 2022

Peter Schryvers, Senior Planner  
The City of Calgary  
5th Floor, 800 Macleod Trail S.E.  
Calgary AB T2G 2M3  
Email: [Peter.Schryvers@calgary.ca](mailto:Peter.Schryvers@calgary.ca)

Dear Peter:

**Re: Letter of Support - Draft Westbrook Local Area Plan**

Shaganappi has had a constructive relationship with City planning staff since the onset of West LRT and has collaborated on multiple City policy initiatives.

We now expect existing projects, zoning and policy to support a forthcoming growth in population to levels higher than the peak set in 1969. Three recent large-scale projects are currently under construction; Brookfield at Crown Point, Truman at West 33 and Truman at West 17. In parallel, we have significant infill activity, multiple R-CG designations and possibly the City's first H-GO application.

#### Community Position on LAP

The Shaganappi Community Association supports the applicable portion of the Westbrook Local Area Plan covering the community of Shaganappi.

However, in order to bring the LAP into congruence with Council's previous May 8, 2017 approval of a 4-story maximum in support of the Main Streets rezoning rationale, we ask for consideration to be given to changing the building scale category for the portion of 17<sup>th</sup> Avenue between 24<sup>th</sup> and 25A Streets from Low to Low Modified.

#### Rationale for Overall Support

- Shaganappi has now achieved general alignment with our previously approved ARP policies, with the notable exception that the new Low building height category signals a generalized 6 story base standard for low density wood frame construction. This may be due to recent building code changes, and perhaps the base medium density district will be adjusted from 5 to 6 stories when (and if) the existing 2017 Land Use Bylaw is updated.
- Certain building requirements previously in the Shaganappi Point ARP have been moved to the Shaganappi Station Area policy (Page 61) in the new plan.

Shaganappi Community Association  
2516 – 14 Avenue SW  
Calgary AB T3C 3V2

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- Engagement and support of Westbrook mall area stakeholders has supported City staff revisiting policy in the former Westbrook ARP area to make it less prescriptive, and hopefully more attractive to developers.
- A large-scale plan with a consistent rationale for all the LAP communities could mitigate the previous "standard" practice of amending policy documents on file review to up-zone development proposals. We anticipate the original rationale for building scale and urban form for our area of the LAP will be maintained.

#### Rationale for Requested Change

- **Consistency With 2017 Main Streets Up-Zoning Rationale – 17<sup>th</sup> Avenue between 24<sup>th</sup> and 25A Streets**

Prior engagement and the attendance of much of our Board at the May 8, 2017 Public Hearing was supportive of a Council approval to up-zone this area to M-U1, at 3-4 stories with a 16 metre height modifier. The 3-4 story maximum addressed the negative impacts on block faces with already well-established single-family streetscapes and at a point where the community is only one block long.

- *Documents on the City's website has the north side of 17th Avenue between 24th and 26th Street restricted to a maximum of 4 storeys, not 6 storeys, in spite of the 16 m allowable height. The height was supported by significant engagement in 2016, and any ancillary rooftop structures were intended to be included in the height determination. See the post-approval document on the City website: <https://www.calgary.ca/content/dam/www/pda/pd/documents/main-streets/local-area-maps/upper-17-avenue-sw-zoning.pdf>*
- *Consequently, a Modified Low, rather than a Low building scale category should be maintained here.*

#### Engagement

We appreciate the openness and candor the City's team have brought to the engagement. We noted a willingness to interact directly with residents and make appropriate adjustments to the plan.

Case studies on the application of the urban form, scale and transit station categories were provided to all interested area Community Association Board members to demonstrate some control of outcomes by Community Association Boards. A new practice of circulating all draft plans to every resident for direct comment, was an excellent way to also demonstrate some control of outcomes by residents.

However, after years of discussion and six major planning studies, many residents of Shaganappi have expressed they are beset with "planning fatigue" and look forward to a period of stability and certainty.

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#### Resolution of Other Shaganappi Policy and Development Issues

Shaganappi already has very current policy by way of the Westbrook Area Redevelopment Plan ("ARP") (2009), the Shaganappi Point ARP (2014) and Main Streets (2017 – by amendment of the Killarney Glengarry ARP).

These policy documents will be rescinded on adoption of the Westbrook LAP, so our focus has been on issues missed or any material inconsistency of the LAP with these recently approved planning policies.

In light of that, we were focused on any change from prior policies affecting the section of 12<sup>th</sup> Avenue (as compared to the Shaganappi Point ARP) and the east section of 17<sup>th</sup> Avenue (as compared with Main Streets). We have also attempted to address recent challenges created by development pressures in the Shaganappi Point Station Area that were not contemplated by policy set in the Shaganappi Point ARP.

The issues raised by us and addressed as drafts of the plan were circulated were as follows:

- **Impacts on 26 Street and 12 Avenue Area Adjacent to Shaganappi Point Station**

New and/or relatively less sophisticated applicants continue to push for zoning well ahead of market demand in the Shaganappi Point Station area. The area is limited by land availability, small, awkward configurations, and is not yet supported by a strong demand by renters.

Residents have been receptive to well-designed multi-residential buildings proposed by more sophisticated applicants who understand market demand. These projects have generally been built to densities below the land use offered in existing ARP policy.

Along the 12<sup>th</sup> Avenue strip, we are attracting viable lower-density row and cottage style applications (including Calgary's first H-GO). Two well designed lower density projects to the west of the new Giordano building (26A street next to the Shaganappi Point station) are now in final stages of completion and are in keeping with the level of market risk applicants are prepared to take. Their building scales are also consistent with those across Bow Trail on Brookfield's 12-acre Crown Park project.

The lack of success, and recent receivership of the community supported Giordano development, as a reasonably sized (73-unit) building of scale, was a consistent concern expressed in resident feedback.

Affected residents in this area felt that the introduction of a Low Modified, instead of a Low building scale category along 26 Street might mitigate the type of aggressive application which has resulted in the failure of three multi-unit projects at this location: the Giordano (26A Street and 12<sup>th</sup> Avenue/ Bow Trail – DP2017-2379), one failed development permit (26th Street and Bow Trail - SDAB2020-0018), and one withdrawn land use application (27th Street and 12<sup>th</sup> Avenue/Bow Trail - LOC2021-0002).

Our requested reduction to Low Modified building scale was not incorporated in the draft plan; however the entire 26th Street connector in Shaganappi will benefit from the introduction of:

- *General requirements for specifically mapped Transit Oriented Development Transition Zones (page 59-60), which now has expanded requirements for public realm, enhancement of the transit interface, requirement of human-scaled environments, the requirement for*

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*enhanced design in exchange for exceeding the building scale, height and massing mitigations, and*

- *Specific requirements for the Shaganappi Point Station Transition Zones (page 61), which include a qualified limitation on commercial uses based on the acknowledgment of the existing 17th Avenue commercial corridor, as supported by brand new Main Streets infrastructure investment two blocks away. These requirements are:*
  - *corner parcels at 26 Street SW and Bow Trail SW are encouraged to develop as gateway buildings with a high level of design and material quality and include greater sidewalk widths to accommodate pedestrian traffic to the station.*
  - *buildings in the Transition Zone should step back at or below the fourth storey.*

We expect these area provisions to be enforced on file review. Policy enforcement has not been a consistent practice in applying similar provisions in the Shaganappi Point ARP.

- **Lack of Certainty Concerning Flanking Lots on 12<sup>th</sup> Avenue, Adjacent to Bow Trail**

The east end of the 12th Avenue strip has blocks oriented north to south. Development and community interests requested that there be an indication of the number of lots covered by the Neighbourhood Connector/Low Modified/Low map shadings. This has been a significant historic issue. The current Shaganappi ARP map graphic shows roughly 30% of the block (i.e. 3 of ~10 single family homes) available for consolidation and up-zoning.

- *Policies have been included in the Map Interpretation, Section 4.2 (page 98, item f) that clarify the building scale in these areas applies 65 metres from the perpendicular street (four typical lots). If proposed development seeks to extend beyond this range, an amendment to the Plan will be required.*

- **Proximity of Existing Density Commitments Surrounding Shaganappi Park**

The original draft LAP documents had Low/Low Modified density introduced around Shaganappi Park. This was inconsistent with a very recent 2017 Main Streets commitment to residents to locate additional incremental zoning a block away along 17th Avenue in the area between 26th and 24th Street.

- *2017 Council approved increases in Main Streets zoning along 17<sup>th</sup> Avenue already have very good access to the park.*
- *2014 and 2021 Council approved zoning increases across the Bow Trail pedestrian bridge at Brookfield's Crown Park site also have very good access to the park.*

- **New Density Proposed - 17th Avenue between 22nd and 24th Street**

A Modified Low building scale category has been introduced, after being considered and eliminated previously by the Main Streets team in 2017, on 17th Avenue.

- *We believe this could be a positive incentive to upgrade the 17<sup>th</sup> Avenue north edge facing the Tecumseh military site at a scale that won't promote difficulties for developers wanting to work with the adjacent caveat-protected single-family homeowners in Upper Scarboro.*

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In Summary

Based on the above, the Shaganappi Community Association supports the applicable portion of the Westbrook Local Area Plan covering the Community of Shaganappi.

However, we ask for consideration to be given to changing the building scale category for the portion of 17th Avenue between 24th and 25A Streets from Low to Low Modified. This change will bring the LAP into congruence with Council's previous May 8, 2017 approval of a 4-story maximum as outlined in the Main Streets rezoning rationale.

Yours truly,

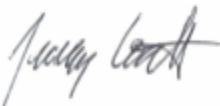
Shaganappi Community Association  
Development Committee



Michael Wilhelm  
President,  
LAP Working Group Member (CA rep)



Brittany Jorgensen  
Eastside Rep,  
LAP Working Group Member (City selected)



Jeremy Coates  
Westside Rep



Mia Leung, BA, Urban Studies  
Development Committee



John van Hemert, Architect, AAA  
Northside Rep



Ron Goodfellow, FRAIC (Retired)  
Advisor

Cc: Courtney Walcott, Alicia Ta, Ward 8 Office, City of Calgary  
Westbrook Team, City of Calgary  
Development Committee, Shaganappi CA





# Main Street: 17 Avenue SW

Shaganappi, Killarney/Glengarry, Richmond and Scarboro-Sunalta West

17 Avenue SW from 37 Street to Crowchild Trail SW, has land use planning policies provided by several plans (Killarney/Glengarry Area Redevelopment Plan (1986), Richmond Area Redevelopment Plan (1986) and West LRT Land Use Study (2009). These plans do provide land use policies that support the Municipal Development Plan goals of a mixed use street along 17 Avenue SW.

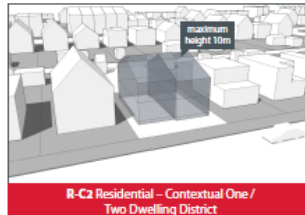
## APPROVED Land Use (Zoning)

When 17 Avenue SW main street users provided input about the future of this area, they shared that they would like to see vacant and large sites redeveloped to add to the local populations and provide an active and interesting street experience. Reasoning could allow for more mixed use and apartment development along 17 Avenue SW and new housing options such as row- or townhouses, in addition to existing single- and semi-detached homes, in the existing adjacent low density areas. In the fall of 2016, local residents provided detailed feedback at public input sessions on a proposed land use framework to meet this growth potential. These comments were considered when refining this proposal.

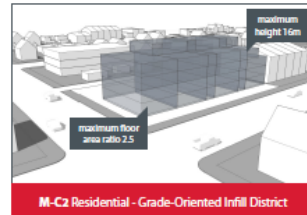
Attachment to Shaganappi  
November 15, 2022 CA Letter  
of Support - Documentation  
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Change

Post Main Streets approval  
document (May 2017)  
currently shown on the City  
website:

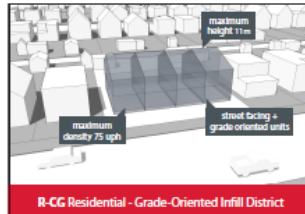
<https://www.calgary.ca/content/dam/www/pda/pd/documents/main-streets/local-area-maps/upper-17-avenue-sw-zoning.pdf>



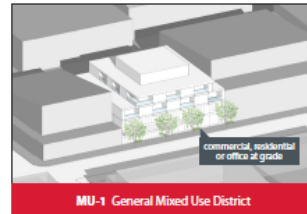
R-C2 is a low density residential designation that is primarily for single detached, duplex and semi-detached dwellings. The district contains many rules that are sensitive, or contextual, to the surrounding scale, requiring lower heights and larger setbacks, for permitted use buildings when adjacent to lower scale buildings.



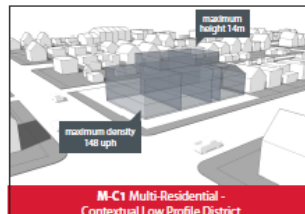
M-C2 is a multi-residential designation in the developed area of the city that is primarily for low rise apartment buildings (4 - 5 storeys) or townhouses. The district contains many rules that are sensitive, or contextual, to the surrounding scale, requiring lower heights and larger setbacks when adjacent to low scale buildings. Maximum density based on building area (2.5 Floor Area Ratio) which typically allows an average 50 foot (15 metre) wide parcel to have about 12 - 16 units.



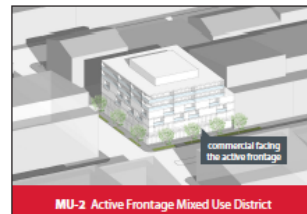
R-CG is a low density residential designation that is primarily for rowhouses that face a street with a front door. Does also allow single detached and side by side and duplex homes. Only slightly larger buildings than allowed by the R-C2 district. Maximum density is 75 units per hectare (uph) which typically allows an average 50 foot (15 metre) wide parcel to have 3 units, 4 units could be developed on a corner site with two street frontages.



MU-1 is a new district recently approved by Council. It was developed to support growth in key areas like Main Streets. Characterized by street-oriented building design in mid-rise buildings typically between four and six storeys in height requiring a transition to lower scale residential uses on adjacent parcels through building location, building massing and landscaping. Main floor can be commercial or residential.

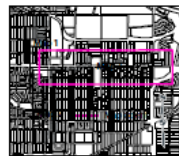


M-C1 is a multi-residential designation in the developed area of the city that is primarily for low rise apartment buildings (3 - 4 storeys) or townhouses. The district contains many rules that are sensitive, or contextual, to the surrounding scale, requiring lower heights and larger setbacks when adjacent to low scale buildings. Maximum density is 140 units per hectare (uph) which typically allows an average 50 foot (15 metre) wide parcel to have 8 units.



MU-2 is a new district recently approved by Council. It was developed to support growth in key areas like Main Streets. Characterized by street-oriented building design in mid-rise buildings typically between four and six storeys in height requiring a transition to lower scale residential uses on adjacent parcels through building location, building massing and landscaping. Main floor must be commercial uses.

## Map 3



### LEGEND

- Land Use District Boundary
- Parcels to be Redesignated
- Ownership Parcels
- 37 St SW / 17 Av SW Main Streets Boundary

### Proposed Land Use Designations

- Residential - Contextual One / Two Dwelling District R-C2 (2 to 3 storeys, 10 metre maximum)
- Residential Grade-Oriented Infill District R-CG (2 to 3 storeys, 11 metre maximum)
- Multi Residential Contextual Low Profile District M-C1 (3 to 4 storeys, 14 metre maximum)
- Multi Residential Contextual Medium Profile District M-C2 (3 to 5 storeys, 16 metre maximum)

- Mixed Use General District MU-1 RLS H16 (3 to 4 storeys, 16 metre maximum)
- Mixed Use General District MU-1 RLS H22 (5 to 6 storeys, 22 metre maximum)
- Mixed Use General District MU-1 RLS H23 (5 to 6 storeys, 23 metre maximum)

- Mixed Use Active Frontage District MU-2 RLS H22 (5 to 6 storeys, 22 metre maximum)
- Mixed Use Active Frontage District MU-2 RLS H26 (7 to 8 storeys, 26 metre maximum)
- Mixed Use Active Frontage District MU-2 RLS H46 (14 to 15 storeys, 46 metre maximum)

(F = Floor Area Ratio; limits density allowed on site)  
(H = height; maximum allowed building height in metres)

## Approved Land Use (Zoning)



This land use was approved by Council May 8, 2017.

Attachment to Shaganappi  
November 15, 2022 CA Letter  
of Support - Documentation  
of Rationale for Suggested  
Change

Post Main Streets approval  
document (May 2017)  
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<https://www.calgary.ca/content/dam/www/pda/pd/documents/main-streets/local-area-maps/upper-17-avenue-sw-zoning.pdf>

20211128



To Whom It May Concern,

I am submitting this letter in support of the proposed Westbrook Local Area Plan (LAP) on behalf of the Killarney Glengarry Community Association.

Our community association has been part of the Westbrook LAP project since it began in 2019, participating and engaging with the City of Calgary through all three phases of the planning process. We believe the consultation on this project has been adequate. While COVID made some parts of the process more difficult and different than similar projects in the past, we do not feel that the City of Calgary used COVID as a way to skip community consultation.

We feel that the plan reflects the culture of the community of Killarney/Glengarry. Since the finalization of our last Area Redevelopment Plan (ARP) Killarney/Glengarry has been cautiously open to development. This has played a large part in making our community the vibrant, and comparatively accessible community it is today. However, as the previous ARP aged it no longer reflected the culture of the community. The proposed Westbrook LAP resolves this and aligns much better with the current state of development we see reflected in the community.

While we support the plan, we do recognize it is not perfect. As Killarney/Glengarry is more open to development, the current proposed Westbrook LAP by-and-large represents how our community already functions. There is some concern that this plan will not age gracefully in our community as it represents how we already exist, and does not have many avenues for growth outside the plan.

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Another issue we have with the plan is that in some ways it is more restrictive to development than the current precedent. For example, the R-CG/H-GO land use is currently allowed within 600m of an LRT station and 400m of BRT stations, both of which our community have. Under the Westbrook LAP R-CG/H-GO is only designated for Neighbourhood Flex and Neighbourhood Connector urban form areas. This will reduce walkability and density around the locations that benefit from it most. We suggest the Westbrook LAP should be amended to keep the City of Calgary commitment to transit oriented development as has been expressed in the past.

The community association recognizes that change is a difficult process, and would like to thank the City of Calgary's administration team for the hard work that has been done to get to this point. We hope our feedback is helpful in improving the Westbrook Local Area Plan and look forward to the future of Calgary this plan will help bring forth.

Killarney Glengarry Community Association Director of Development

Jeff Davidson

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# Richmond Knobhill Community Association is **OPPOSED** to the Westbrook LAP

- This is **not a planning process** and contains no planning as we know and understand it – the Planners were told to upzone and that's all they did – there was no 'community planning'
- There has been **no engagement** in a proper manner Several committee members have stated that if they ran a process like this they would be fired
- **Developers should not be at the table.** They are not residents they are not city planners, they are marketers and motivated to optimize returns
- The plan effectively **eliminates low density zoning** as we know it replacing it with higher density everywhere
- There is **no statistical analysis** in support of what's being done – how many units? How many people? How many cars? How many new homes do we need?

- The planners claim to have reached agreement with the communities on the upzonings – **this is not true** – there is no agreement
- **No conversation regarding green space and school enrollment.** MDP says 2 ha open space per 1000 people – the planners have ignored this because its not convenient
- LAP's with **so many different communities** is inappropriate and will not result in effective planning
- Many questions have been asked of the planners and have gone unanswered

**Phil Harding**, Director: Westbrook LAP & Viscount Bennett  
Redevelopment Committee Head, Richmond Knobhill CA

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**Kevin Widenmaier**, President, Richmond Knobhill CA

[president@richmondknobhill.ca](mailto:president@richmondknobhill.ca)

Nov 22, 2022



4411 10 Avenue SW  
Calgary, AB  
T3C 0L9

November 17, 2022

City of Calgary  
Westbrook Community Local Area Plan

Please accept this letter as the response from the Rossscarrock Community Association to the final local area plan being submitted to City Council. We support the Plan as submitted.

On behalf of the Planning & Development Committee of the Rossscarrock Community Association we want to first indicate that our CA had 2 Board members who participated on the Westbrook Communities Local Area Planning group process, led by the City of Calgary. As a result we have a good understanding of how the final plan was put together. We believe the City of Calgary lead team were responsive to the CA's and conducted the discussions in a professional and respectful manner. We felt we were heard and able to contribute to the Plan.

In particular we focused on ensuring we had the best range of housing choices, responding to concerns about change. We felt the proper approach was to put densified housing in strategic and/or rational locations within a community, rather than carte blanche. One could consider this a compromise towards a win-win outcome.

As the CA that encompasses the Westbrook Mall, we feel very strongly that this 'place' holds important positioning as the hub or the glue for all of the Westbrook Communities. However it needs a major upgrade of form and function. It has amazing potential especially given some of the other assets already assembled nearby such as the library.

We view the Plan as a guideline to all stakeholders in the development process, so consistency and clarity are central for future considerations and decision making. We are also hopeful that while the Plan is going to be presented in front of City Council for approval that the City would also be open to future amendments if the situation arises.

Gary Ellis  
Board member, Rossscarrock Community Association and  
Committee member- Development and Planning



## Spruce Cliff Community Association

2022 Nov 14

3375 Spruce Drive SW

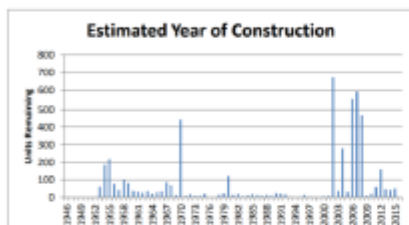
Calgary AB T3C 3A3

Email [sprucecliffassoc@gmail.com](mailto:sprucecliffassoc@gmail.com)

### Spruce Cliff Community Association submission for the Westbrook Local Area Plan –v. 2022 October @ City - Infrastructure & Planning Committee 2022 Dec 8

Spruce Cliff has evolved in measurable ways. Growth that between 2000 and 2016 has seen 48% of the units in the community redevelopment resulting in higher community density than the prior built forms, all without an ARP. Redevelopment activities did not stop between 2016 and 2022 (we await the 2021 census / community profile data). We need a plan.

Calgary.ca / Spruce Cliff profile 2016



Dwellings by period of construction

Spruce Cliff		
	Number	Per cent
Occupied private dwellings	2,285	100%
1960 or before	495	18%
1961 to 1980	595	22%
1981 to 1990	150	7%
1991 to 2000	125	5%
2001 to 2005	260	11%
2006 to 2010	595	26%
2011 to 2016	255	11%

Calgary		
	Number	Per cent
Occupied private dwellings	466,730	100%
1960 or before	46,475	10%
1961 to 1980	136,655	29%
1981 to 1990	60,930	13%
1991 to 2000	73,405	16%
2001 to 2005	62,470	11%
2006 to 2010	56,135	11%
2011 to 2016	46,755	10%

Investment in the public realm of Spruce Cliff has not followed the growth in population and unit density achieved to date. We are concerned with the aspirational, seeming disproportionately more within the plan assigned to Spruce Cliff without some linked commitment to fund public realm improvements. Improvements evaluated for timely implementation, with a community productivity of land measurement framed by the historic community boundaries.

Communities that were early movers on redevelopment in an around the Westbrook LRT are penalized in this document; with measured performance being a population growth start date of 2009. For Spruce Cliff this excludes the Tower development north of Bow Trail and the redevelopment of the entire Hemlock Crescent residential street. (2000-2008). A land productivity vs "user" measurement would help offset this penalty.

Growth -	Population	Units	Person per unit
1972 Peak	3927	1297	3.03
2005 Low	2859	1313	2.18
2009	3518	1665	2.11
2016	4583	2235	2.05
2019	4673	2431	2.00

For a community that is 70 % apartment dwellers, with 61% of residents as renters we are not city average, nor are we MDP defined "inner city". We seem to get blended in analysis to lift some and diminish recognition of this community's growth achievement and don't make the investment project lists – in capital or operational budgets.

#### Housing Tenure

Spruce Cliff		
	Number	Per cent
Private households	2,285	100%
Owner households	895	39%
Renter households	1,390	61%

Calgary		
	Number	Per cent
Private households	466,730	100%
Owner households	333,455	71%
Renter households	133,275	29%

Calgary.ca- Spruce Cliff profile 2016

In the years we wait for improvements to the public realm, some corrections are further delayed in areas adjacent to a land rezoning that a future development permit might fix. The interim conditions are impossible for some to navigate.

E.g.:

Missing link sidewalk – Closure/sale of 11<sup>th</sup> Avenue SW in 2016 impacting the walking route to the LRT and the library that was relocated to the south side of Bow Trail.



Conditions for Spruce Cliff on the walking route to groceries and school on the north end of the 37<sup>th</sup> Mainstreet Project intersection– in the splash zone of the Bow Trail 60 km (legal) arterial road.

We were told the Established Area Growth and Change program does not fund “deferred maintenance” and our list of asks were deemed to be mostly that:

- engineered walk ways;
- reinstating to underground the growing extension cord network that keep the streetlights on.
- deteriorated, too narrow or missing sidewalks

This pilot Local Area Plan project has been stressful and challenging – in part due to the protracted covid delays. Initial working groups were tangled often talking about “users” vs land use; which has resulted in some strange community labeling. The engagement evolved over the course of the project and some of our comment has influenced this draft; so that the redevelopment form, when it happens, can improve on current conditions.

- E.g.: comprehensive planned site south of 8<sup>th</sup> Ave – so that the general population of Spruce Cliff can have a legal and reasonably direct access route to the pedestrian bridge over Bow Trail.

pg. 2

There are surprises in this October version not shown on the prior drafts publicly circulated: e.g.: the appearance of 26 storey towers on the city land north of the existing towers. We hope this site redevelopment is somehow part of a broader conversation to eminently get the surrounding Westbrook LRT site built, something in all discussion across communities everyone seems to have agreement on.

The strategy of the aspirational density lifts to increase land value seems to have sterilized land in the southern section of the TOD lands and looks to be directionally repeated in this document for the TOD lands in Spruce Cliff north of the existing towers.

The proposed tower form at this site also seems to conflict with the goal to increase “missing middle” especially in a community that is already developed with 70% of its units as apartments. We ask for an amendment to change the scope in the wording of the “comprehensive plan sites” to be more flexible to form, if not overall site density. (Clause page 42- item 2.2.5 d)

Even with current zoning, growth and change in the community will continue to intensify. We believe Spruce Cliff has earned some public realm investment. Helpful in the community’s evolution would be your support to amend this plan to clarify by what qualifying measurements that will occur. Funding with an implementation time line to support the “carrots” in Section 3 (statutory) and further defined in Appendix 1 (non statutory) in a more defined time frame than over 30 to 60 years.

- amendment to direct public realm investments to be made (starting) in the 2023-26 budget cycle, prioritized by a community-based evaluation weighted with land productivity achievements.

We have been told managing community change will be easier with a plan. The world of change within Spruce Cliff’s built environment has not gone on “hold” so we continue to evolve one application at a time. We work to contribute constructive comments; that we hope lessens negative impacts and improves the community in some positive way for those who have chosen this community to be their home.

Thank you for the opportunity to contribute comment for the 2022 Dec 8<sup>th</sup> Infrastructure and Planning Committee considerations of the Westbrook Local Area Plan – Version 2022 Oct.

- We need a Plan
- Measurement start date – from “low” not an arbitrary start date of 2009
- Measure land productivity -units over developable area, in considering where to invest in the public realm
- Amend scope of the “comprehensive plan site” 2.2.5 d on page 42 for flexibility in built form and context of the entire Westbrook TOD boundary.

Lois Sime  
President  
On behalf of the Spruce Cliff CA Board

Attachment 1 Public Realm in Spruce Cliff.

Copy to:  
Ward 6 - Councillor Richard Pootmans  
CA Ward 6 - Ralph Smith  
Westbrook Local Area Plan- Peter Schryvers, Sr Planner, Community Planning  
– for inclusion in the report of the Plan to Committee

pg. 3



**Attachment 1**

Spruce Cliff CA – comment WBLAP 2022 Dec 8<sup>th</sup>

Sample photos of our Public Realm conditions: We need timely investment!

Engineered walkways:



Dead end sidewalks with no marked crossing often entering the street between parked cars



Missing sidewalks with clear wear patterns showing desired walk routes



Park Conditions / wear and tear / access



Ageing sidewalks increasing mobility risk



Design - Rolled curbs – narrowing already narrow sidewalks .Above ground utility conflicts for urban forest . Narrow sidewalks sharing the curb with Bow Trail traffic. Wayfinding signage to a significant Historic site – Quarry Road Trail.



pg. 5



Volunteers contribute to the neighbourhood's care. As the sample of photos show, we do need the city's help with public realm investments.



Some communities clear ice rinks we clear our sports courts to help compensate for limited access to indoor space.



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GLENDALDE/GLENDALDE MEADOWS COMMUNITY ASSOCIATION

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[president@myglendale.ca](mailto:president@myglendale.ca)  
403.796.6662

November 18, 2022

Re: Westbrook Communities Local Area Plan  
Glendale/Glendale Meadows Community Association Response

To City of Calgary  
Attn: Peter Schryvers, Senior Planner, North Area, Community Planning  
Coun. Sonya Sharp, Chair, Infrastructure and Planning Committee  
Coun. Richard Pootmans, Ward 6  
Coun. Courtney Walcott, Ward 8

Fundamentally, Glendale is in support of the idea of a Local Area Plan. It is critically needed to establish a path forward for further growth of our community. We don't believe the current plan is that path forward for Glendale. The Westbrook Local Area Plan's key vision statement notes: "The Westbrook Communities will continue to thrive and grow into a walkable, bikeable, mixed-use area with high-quality public and open spaces that residents in and beyond the Westbrook Communities can enjoy, supported by the redevelopment of Westbrook Mall as a focal point for the Westbrook Communities."

**The LAP is not concrete enough**

After examining the current plan in detail, one starts to notice it is full of good intentions with little ground to enforce the growth of a high-quality, diverse, sustainable community. Many of the policies are misleading in that they may not actually be required for future developments, but rather developers will be able to do what they want. The language within most of the document seems to be suggestions rather than requirements. Within the Site Design section of the plan, most of the policies are worded in a way that will not require future development to comply. Wording such as *should*, *consider*, and *where possible*, appear to be only suggestions to future developers. To truly meet the vision statement and core ideas noted within the plan, the city needs to provide more teeth to the plan to ensure future development fulfills the goals established within it. If not, the plan is set up to fail from the start. Section 3 Growth, outlines many great ideas and policies: from built form and site, investment in parks, diversity in housing, and sustainability. Most of these policies are written in a manner that will not be incorporated into future developments.

**The LAP does not allow for vibrant, diverse communities**

Glendale residents want a community that provides a public realm that has been written about time and time again from authors such as Jane Jacobs, Edward Soja, and Sharon Zukin. Within the plan there is little commitment from the city to provide new infrastructure that will support the public realm. Be it within the city parks or updating existing outdated sidewalks. Current development along the

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GLENDALDE/GLENDALDE MEADOWS COMMUNITY ASSOCIATION

existing Main Streets projects on 37<sup>th</sup> Street S.W. for the most part have not provided fully mix-use live/work redevelopments. Most are turning out to be multi-unit residential development. This is only increasing the density of the neighbourhood but does not provide the needed commercial, retail, and services growth, adding more people in our communities with no destination points to go to.

**The LAP does not encourage quality-built and intentional buildings**

The notions of the built form within the current plan only value the aesthetics of a building more so than the actual design and function of the building. Will future developers spend more to build long-lasting, well-considered buildings? Within neighborhoods that have had a lot more redevelopment, multi-unit developments tend to have similar homogenized quality and design. Developers ultimately tweak exterior cladding from one project to another, but build similar structures continually within a single area.

**The LAP will result in less affordable housing options, and a less diverse community**

Despite claiming to offer a greater variety of housing options, both in terms of structure and cost, in most cases the new plan will foster redevelopment of existing Glendale single-detached homes that sell for approximately \$500,000 and turn them into eight-unit structures. Most of these units sell for over \$700,000, which tends to be less affordable than the original home. This model does not make housing more affordable, but it is quite profitable for the developer. We want our neighborhood to grow in a manner that provides more housing options that will encourage people from different socio-economic backgrounds to live here. Glendale believes the current plan actually does the opposite.

**The LAP does not foster real change towards a greener future**

The sustainability goals within the plan are great in theory; however, like the other policies within the Growth section, are mostly suggestions. The plan's only real attempt at reducing emissions and carbon is by reducing the number of vehicles in our community. The land use re-zoning that will come out of this plan will allow for reductions in required on-site parking. In theory, this would result in more residents choosing public transit over owning their own vehicles. There have been several comments made throughout the engagement sessions by Westbrook residents who disagree with actuality of this idea. Outside of reductions to required on-site parking, which seems to be the only real means to achieve a resemblance of sustainability, the remainder of the policy will fall short of providing any real change towards a greener future. Without actual requirements outside of the bare minimum building code, Glendale will be redeveloped with structures that only meet the minimal performing building envelope targets—targets that don't come near the requirements of Zero Carbon and the passive house strategy. There will be major impacts to stormwater management systems, as lots are redeveloped, lot coverage will increase, and the overall water absorbing landscaping be reduced.

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GLENDALE/GLENDALE MEADOWS COMMUNITY ASSOCIATION

Notions of zero energy are great within the plan, but there is nothing to ensure that each redevelopment has a minimum of on-site energy production. Redevelopment as outlined within the plan tends to remove tree canopy from the private owned land to allow for greater buildout of a lot. One great policy within the plan is to protect, maintain, and enhance the tree canopy. Glendale is full of large healthy trees which allows for great biodiversity. If the city does not provide more means to enforce these policies, much of Glendale's tree canopy and biodiversity, will be lost.

**The LAP drastically underdeveloped existing Commercial lots**

This policy fails to address the drastically underdeveloped existing Commercial Centre and Commercial Corridors. Most of the existing Commercial Centre and Commercial Corridor lots around Glendale date back to the 1950s-60s. Most have met their life expectancy, are single storey, and filled with on-site parking. The plan should incentivize these outdated underdeveloped lots to be redeveloped with mix-use structures that include ground floor retail/commercial spaces and residents above. The centre of the plan is the Westbrook Station development which has been sitting vacant for over 10 years now. This undeveloped space will be the heart of the Westbrook LAP someday. Glendale residents get excited with the notion of a space like that of the University District and to a degree, Marda Loop. Without Westbrook Station development there is a major hole at the centre of the Westbrook LAP.

**Checking required boxes engagement process**

Engagement within the planning process has been complicated and unclear. There were several working groups contributing to the development of the plan. From community association (CA) working groups to industry representatives such as builders, developers, architects, and planners, most of whom do not live within the communities, or have stock in them outside of potential for monetary gain. The fundamental values and goals of both groups are different. The CA working groups representatives tended to push the planners for better quality space for the communities. Many within the CA working group felt that their comments and concerns were often not addressed or pushed to the side as the planners deem they were outside of scope of this project. One main issue raised with the planners was the notion of metrics. The plan does not outline actual numbers of density from a current post-COVID perspective to a desired end state. Without this there is no way to confirm the success of the plan or the appropriate means to achieve the desired end state. The city's planners often treated the CA working group as a sort of spell check for major errors within the plan, but any actual feedback was not taken into consideration. It seemed that for the most part, the city planners were performing community engagement to check off required boxes. Many within the CA working group felt it was a waste of their personal time and city funds to undertake such a process.



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**Collective, creative solutions will work**

Glendale is open to working with the city to develop a plan that works for our community, that represents our values and vision for Glendale.

In good faith, Glendale submitted a detailed response and proposal last April to promote discussion of solutions that we thought our community would get behind. We did not get a response to our proposal until Nov. 15, 2022, two weeks after the final policy was drafted and we were told no changes to the document would be allowed. We have attached the map of our density plan once again for Councillors to consider. Again, in a final public engagement session in person on Nov. 7, city planners brought a new map with them which revealed in detail the drastic changes being proposed for Glendale and neighbouring communities. Community Association representatives from Glendale and other communities who attended the meeting were shocked by the visual.

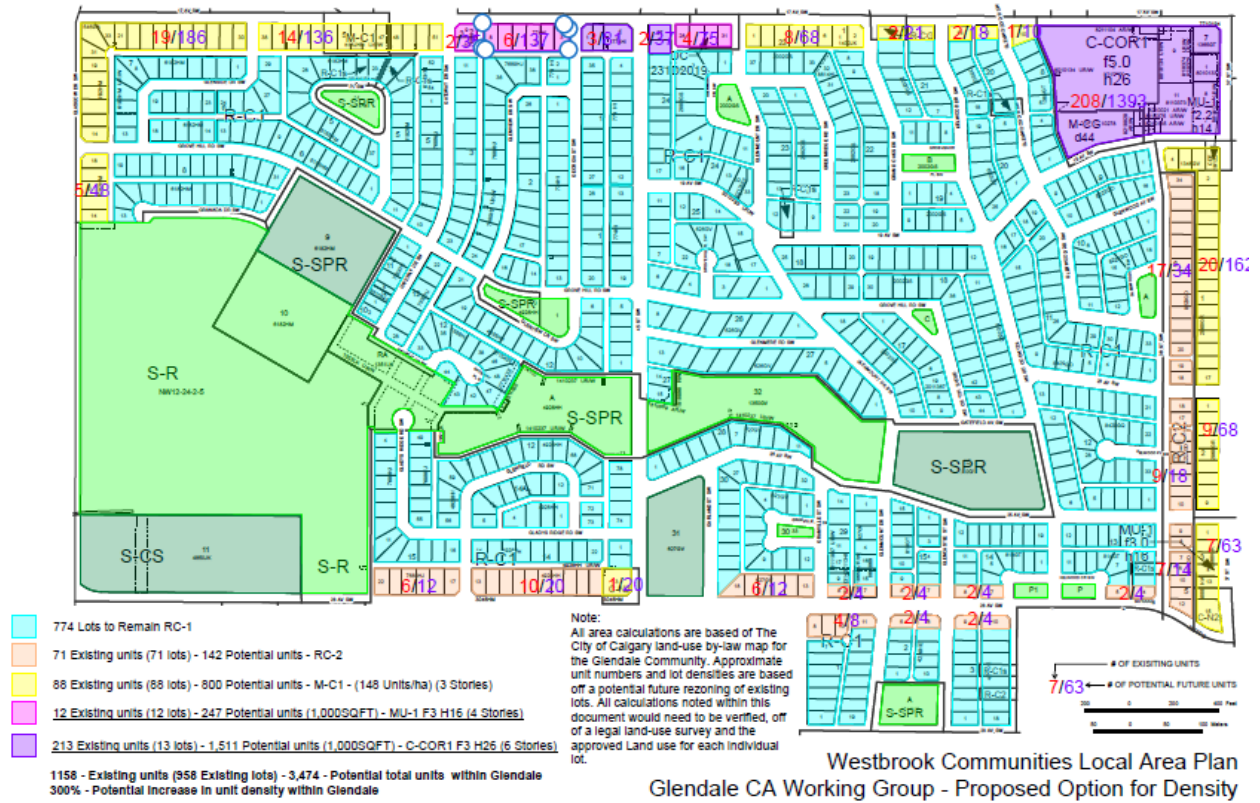
Our plan promotes significant increase in density for Glendale focused on perimeter streets, enhances commercial opportunities and preserves the fabric and heritage of the neighbourhood we love and the affordable home-with-a-backyard lifestyle that will be eroded to extinction should this policy be approved as is. What works for Shaganappi or Killarney doesn't necessarily work for Glendale and the reverse is also true.

We have dedicated volunteers in Glendale who have been part of planning processes from before the West LRT to 37<sup>th</sup> Street Main Streets and now the Westbrook Communities LAP. Promises made more than a decade ago to build density while preserving the core of our community are being broken. It is wrong to constantly move the goalposts for residents and the proposal that sits before us is also wrong. Trust is being broken.

Glendale is opposed to the Westbrook Local Area Plan, as it is currently written. We want our community to grow and thrive while preserving the character of our community and the quality of life that generations of our residents have chosen since 1955.

*Chris Welner, President*  
*Christopher Onyszchuk, Chair, Development Committee*  
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Attach: Glendale Density Proposal Map





## GLENBROOK COMMUNITY ASSOCIATION

3524 – 45 Street S.W.

Calgary, Alberta

T3E 3V2

Phone: (403) 249-6664

[Glenbrook.community@shaw.ca](mailto:Glenbrook.community@shaw.ca)

Date: November 18, 2022

Re: Westbrook Local Area Plan-Glenbrook Community Association Response

To: The City of Calgary

Peter Schryvers, Senior Planner, North Area, Community Planning

Coun. Richard Pootmans, Ward 6

Glenbrook Community has been experiencing redevelopment for the past decade and have historically supported redevelopment in Glenbrook. We were excited to have an opportunity to participate in the development of an Area Plan for Glenbrook. At the beginning we, were told “nothing was off the table” to be considered for the Area Plan development.

Glenbrook Community brought our concerns to the table. As one of the most densely populated communities in the group, we have needs for The City of Calgary to increase financial investments in Glenbrook to support the increased density. From our residents, we heard their concerns with redevelopment were around the protection of our natural areas and trees, the lack of pathways/bike routes, the outdated sidewalks in the community that do not even have ramps to accommodate accessibility concerns, the marked increase to on street parking demands over the past 10 years from redevelopment and the streets and roads in Glenbrook were designed and built to accommodate the traffic patterns of the 1960’s and 70’s and are not adequate for todays diverse modes of transportation or usage.

The Westbrook LAP has disappointed us. We do not see a pathway to increased livability in Glenbrook, on the contrary we see diminishing level. We have seen little to no public engagement over the Westbrook LAP. We saw an engagement with the Glenbrook Community Association and the expectation we would be the conduit to the general population. We did not feel this was our responsibility. This is a City of Calgary program and therefore it should be the responsibility of the City of Calgary for the engagement process.

While supported of some of the content, we cannot support the Westbrook Local Area Plan at this time. For the most part, our residents are not aware or do not have a good understanding of the potential impacts this plan would have on their community. We need to see a clear path the City of Calgary is willing to support us as it moves to higher densities in established communities.

Respectfully Submitted,

Murray Ost, President

Glenbrook Community Association

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Celebrating over 50 years of Community Service

**Wildwood Community Association**  
4411 Spruce Drive SW, Calgary, AB, T3C 2B1

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#### **WILDWOOD OPPOSES WESTBROOK LOCAL AREA PLAN IN ITS CURRENT FORM**

Through several discussions with members of our community, a poll, and review of the feedback received by City of Calgary Planners through their "What We Heard" and "What We Did" reports about its proposed up-zoning throughout the community, the Wildwood Community Association OPPOSES the Westbrook LAP as it is currently written.

The feedback from and for the community of Wildwood has been overwhelmingly against the type of up-zoning City Planners are proposing in the Westbrook LAP. This has been voiced by both residents within Wildwood and in the Did You Hear Reports (where negative comments about development and built forms proposed were dominate). A one-size fits all approach does not work and should not have been applied across all Westbrook communities, for each community has unique attributes that are ignored in the current version of the Westbrook LAP. Wildwood community members often cite disliking the higher density communities like Killarney, Altadore, Marda Loop, and others they lived in before and move to Wildwood for its RC-1 status. They cite increased traffic issues, parking disputes, pedestrian and cyclist safety, and increased crime as key attributes for leaving these higher density neighbourhoods and moving to Wildwood for its parks, access to dog parks, safe cycling for kids, lots with backyards, and its sense of community, where neighbours help neighbours.

Simply, the community does not want up-zoning of semi-detached homes throughout the entire community, nor does it support the development of 3+ unit rowhouses and larger buildings anywhere within the community.

#### **WILDWOOD IS A CLOSE-KNIT, FAMILY-FRIENDLY NEIGHBOURHOOD**

Wildwood is a close-knit, family-friendly neighbourhood that prides itself on having a strong community spirit and neighbours that help each other out. The Wildwood Community Association is run by a dedicated group of volunteers who believe the best way to improve their local community is by being a good neighbour. It has a rich history that is closely tied to the founding and development of Calgary.

According to census data from 2016, there is a population of about 2,560 in about 1,035 dwellings of which 94% (970 dwellings) are single-detached family homes. 4% (40 dwellings) are listed as duplexes and 1% (10 dwellings) are listed as semi-detached. There are zero apartments or 3+ unit rowhouses.

The number of people who live in Wildwood households is like the rest of Calgary's in that household sizes in Wildwood are on average 2.5 people whereas the City's is 2.6 people per household.

The six-year-old census data does not reflect the changes that occurred within the neighbourhood since 2016.

#### **THE CITY PLANNING DEPARTMENT'S ENGAGEMENT PROCESS WAS INCOMPLETE AND ONE-SIDED**

City Planners indicated during Working Group meetings that they followed the International Association of Public Participation (IAP2) engagement process. This is not true, as the engagement process stalled on Stage 1 known as "Inform" and did not progress beyond that. The engagement approach used by City

Planners for the Westbrook LAP did less than the bare minimum required to meaningfully solicit feedback from the larger community.

In fact, its approach to engagement would not meet the test for engagement by the Canada Energy Regulator, Alberta Energy Regulator, BC Oil and Gas Commission, Northern and Indigenous Affairs Canada, Canada Environmental and Protection Agency, Canada-Nova Scotia Offshore Petroleum Board or the Canada-Newfoundland Offshore Petroleum Board for development projects.

If you review the IAP2 Spectrum of Engagement, you will find that City Planners have been stuck in Stage 1 - "Inform" mode and have not moved to Stage 2 - "Consultation" throughout this project. Furthermore, City Planners went quiet on the Westbrook LAP during COVID. This eroded Working Group participation of community members, which started with 29 community members then dwindled to half or 15 when engagement restarted. This resulted in a one-sided approach that favoured developers over community participation on the Working Group. Furthermore, Community Associations struggled to attract volunteers and were managing reduced revenues during COVID so their ability to engage with City Planners was strained.

One big inconsistency with the IAP2 Spectrum is that City Planners only informed and attempted to engage with community members of Wildwood and the larger Westbrook area for approximately 60 days. One was near Christmas 2021 and the other was in June 2022 as the school year was closing. These were not ideal times to engage citizens who have limited time, knowledge, and capacity to review and understand such extensive and complicated technical documents when their thoughts are on Christmas holidays and the end of the school year. For example, in June 2022, Engagement booklets were mailed to households starting the "week of June 6". The first of two in-person engagements with the public over the entire three years happened on June 21, 2022. The second one happened November 7, 2022, after the LAP was considered final and City Planners would not consider any proposed changes without Council direction. This is inadequate and unfair.

Another inconsistency is that there has been no attempt at "accommodation" of community interests. Concerns expressed in the City's "Phase 2: EXPLORE – What We Heard Report" of June 1, 2022, highlighted many concerns for the development proposed in Wildwood. However, in the "Phase 2 – EXPLORE: What We Did Report" of June 1, 2022, these concerns were outright dismissed.

An example of this is that City Planners said that "We have heard from stakeholders that all communities should contribute to housing diversity, and no community should be exempt from allowing different scales of housing." When asked how many stakeholders they heard from and what was their interest, they refused to answer. Are they developers, members of Killarney, who? This is disingenuous based on the feedback identified in the What We Heard Report.

Currently, there is no "Informed Consent" by the public on this project for they were not provided adequate opportunities to be meaningfully involved. Furthermore, as actions indicate, it is evident that City Planners are not interested in obtaining informed consent from community members who should have a say in how their community will evolve, for they are the ones who live there.

As an example of engagement gone wrong, I will also highlight that at the Open House on November 7, 2022, City Planners released a detailed map of locations where they will allow higher density development at one of their engagement tables that had not been seen previously by the Wildwood



Community Association, Working Group members, Community Associations, or members of the community. This map had been buried on page 11 of their *"Increasing Housing Choice: Key Considerations for Limited-Scale Policy Direction"* document not easily found on the website. It is not included anywhere in the LAP document itself.

***Request from Wildwood:** The City of Calgary Infrastructure and Planning Committee (IPC) and City Council should recognize that the engagement undertaken by City Planners with the general public was inadequate and needs to direct City Planners to do another round of engagement that follows the IAP2 Spectrum, which is meaningful and full, and empowers community members to provide adequate informed feedback and not be unduly dismissed.*

#### **THE LAP CONTRADICTS ITSELF WHERE BUILT FORMS OF 3-UNITS OR MORE ARE APPROPRIATE**

On the Limited Scale Map, City Planners highlight in Point 1 that – "In communities such as Wildwood, due to longer blocks and different road patterns, there are fewer places that allow 3 or more unit developments" whereas for Killarney in point 7 it states – "Three or more unit homes are also allowed on corner lots in communities like Killarney, where corner lots face the avenues, this creates streets with a consistent character of rowhouses." Wildwood does not follow a typical grid pattern of streets. Instead, it is a community of mostly meandering, long crescents where 3-unit and 4+ storey development is mostly inappropriate, as it would not be near transit centres nor commercial businesses.

None of the locations proposed for 3+ unit development make any sense other than going through a map exercise identifying where corner lots exist. It does nothing to address the loss of tree canopy and green space that will be lost in these locations, for developers have proven over and over again that it is easier for them to just rip out every piece of vegetation instead of preserving old growth, healthy trees that are 50+ years old and house a variety of wildlife that is abundant in Wildwood, due to its proximity to the Bow River compared to other communities.

Furthermore, much of what planners have presented have neglected to follow their own Municipal Development Plan, which acknowledges in Section 3.5.1 that the character of established neighbourhoods should be preserved.

#### **THERE IS AND NEVER WAS AN AGREEMENT WITH CITY PLANNERS TO SUPPORT THE LAP**

We have heard claims that City Planners said they reached agreement with communities that they support the Westbrook LAP. This is not true. No such agreement exists or has ever existed between the City and the community of Wildwood that supports higher density development. We put the burden of proof upon City Planners to prove such an agreement exists.

#### **DESPITE ASKING, NO PROCESS WAS PROVIDED FOR WILDWOOD TO APPLY FOR A SINGLE-DETACHED SPECIAL POLICY AREA**

The Guide to Local Area Planning "includes policy encouraging the sensitive integration of new buildings with their surroundings, as well as a new tool to allow for areas within a community to be identified as a Single-Detached Special Policy Area to limit redevelopment to a single-detached housing form."

Due to the uniqueness of Wildwood's layout and 94% of homes being RC-1, not being within 600 meters of a transit LRT station, a unique street layout compared to other Westbrook communities, and other factors, Wildwood requested to explore how they could be considered for a Special Policy RC-1 Study Zone, like that granted to Rosedale in Northwest Calgary. Wildwood, as well as other communities, was ignored on this request. Not only was a process on how to apply never provided it was repeatedly stated by City Planners they would not even consider it. Is this consultation or accommodation in terms of engagement, certainly not.

Furthermore, the City indicates on its own website that there is more than adequate developable land zoned appropriately already in the inner city/inner suburban areas to meet all necessary city needs to 2069.

***Request from Wildwood:** Wildwood requests that the IPC and City Council direct City Planners to provide a process to the Wildwood Community Association President, Matt Stambough, and Director, Community Advocacy, Larry Lalonde, on how to apply to be considered for a Special Single-Detached Special Policy Area. We also continue to request that more time be granted for additional meaningful engagement so that this can be adequately considered.*

#### **THE WESTBROOK LAP CONTRADICTS THE "WILDWOOD COMMUNITY DEVELOPMENT CHARTER"**

As a result of the ongoing growth in Calgary's population and increasing demand for inner-city housing, established communities have felt the pressure of development within their boundaries. Because the Community Association realizes inner-city neighbourhoods, such as Wildwood, are viewed as desirable locations for redevelopment, the community instituted the "Wildwood Community Development Charter" to guide its development committee on supporting redevelopment that is sensitive to the current context of the neighbourhood and provide a clear description of the community's character and vision for future development. The Westbrook LAP, as written, not only contradicts this Charter, but it also ignores it.

The purpose of the Charter is to provide property owners, architects, developers and planners contemplating projects affecting Wildwood with the planning considerations the community perceives to be most important when evaluating development permits. The Charter is a companion document to the applicable City of Calgary guidelines, by-laws and "Low Density Residential Infill Guidelines for Established Communities". This guide has been followed since 2009.

The Westbrook LAP fully contradicts the "Wildwood Community Development Charter". With the implementation of the Westbrook LAP, developers will be empowered to ignore community wishes that retain the contextual value of their inner-city RC-1 neighbourhoods.

***Request from Wildwood:** As it currently stands, the Westbrook LAP ignores the "Wildwood Community Development Charter" by allowing 3+ unit rowhouse development that should not exist on the corners within "Crescent-type streets". This is predominantly the type of streets that exist within Wildwood.*

*It is the Wildwood Community Association and residents wishes that development within Wildwood must be sensitive to adjacent homes with respect to building mass and height and the LAP be rewritten to remove the direction of 3+ units to be allowed on corners of crescent-type streets within Wildwood.*

#### **THE WESTBROOK LAP, IN ITS CURRENT FORM, DOES NOT SUPPORT CONTEXTUAL DEVELOPMENT**

Wildwood is supportive of "contextual development". Sadly, despite the LAP having several locations that identify contextual development or per its Core Idea of "*Achieve a strong sense of community identity in safe and inclusive communities by building upon the unique characteristics of individual communities*" as important, City Planners have ignored this and are applying a one-size fits all approach to all neighbourhoods in the identified Westbrook area. The following pages/sections refer to contextual development within the LAP: page 8; Section 2.2.1 (page 23); Section 2.2.1.6.e (page 30); and Section 2.3.6 (page 47).

As guided by its Development Charter, Wildwood Community advises proponents of new development that they must strictly adhere to the "*Low Density Residential Infill Housing Guidelines for Established Communities*". If a Development Application deviates from these Guidelines, the onus should be on the Applicant to fully demonstrate that such deviation is consistent with Wildwood context to the satisfaction of the Development Committee and adjacent residents.

Wildwood prepared its Development Charter to provide focus and clarity to the concept of community "context". The Community encourages proponents (in this case City Planners and City of Calgary) to seek input from neighbours as well as the Development Committee. Wildwood residents are an important resource offering valuable insight when considering the matter of Context. So, why are City planners not meaningfully engaging with members of the community?

*Request from Wildwood: Currently, most citizens with Wildwood are unaware 3+ units can be built on corner lots near them. Wildwood requests that the IPC and City Council direct City Planners to engage with all properties on corner lots and those that are adjacent to corner lots before the LAP is approved.*

#### **CLOSING**

The Wildwood Community Association has strived to provide thoughtful and consistent perspectives on development issues affecting the community. It has done this consistently as Wildwood has evolved to include new RC-1 built forms replacing existing bungalows.

Unfortunately, City Planners have not fulfilled their "Duty to Consult" with the broader community on the impacts of the LAP on their individual property rights. It is time for the IPC and City Council to correct this by directing City Planners to undertake additional engagement before approving the Westbrook LAP.

Sincerely,

**Larry Lalonde**  
Director, Community Advocacy  
Wildwood Community Association  
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E: [larrylalonde11@gmail.com](mailto:larrylalonde11@gmail.com)