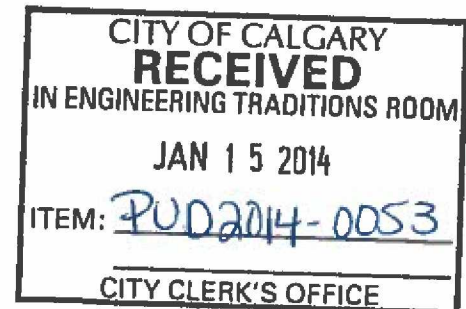# URBAN DEVELOPMENT INSTITUTE - CALGARY

January 14, 2014

Members of Special Policy Committee for Planning & Urban Development
City of Calgary
PO Box 2100 Station M
Calgary, AB T2P 2M5

Dear City of Calgary Councillors:

Re: **New Community Planning Guidebook**

UDI-Calgary would like to express appreciation for the collaborative effort, dedication and patience demonstrated by the City's Management, Administration and Staff in preparation of the proposed New Communities Guidebook.

Background

The Guidebook initially presented a challenge for UDI-Calgary Membership – there were concerns the Guidebook was adding a new layer of Policy to the MDP. Concerns were exacerbated by the timing of the release in August (post-flood, during summer holiday season), and the resulting constrained and condensed timelines for review. A committee was struck in September to meet with City Staff and begin discussions on the Guidebook. Unfortunately, with the hurried schedule, the two groups still had outstanding issues leading into CPC in October.

Despite UDI-Calgary's earlier concerns and shortly after CPC, the UDI-Calgary Board of Directors met on November 5th and reached a consensus to support the Guidebook going forward with the outstanding issues to be resolved prior to adoption. Meetings resumed in November between UDI-Calgary and City Administration and Staff to consider further refinements or revisions to the Guidebook.

Support for Guidebook with Refinements

UDI-Calgary respectfully requests the support of the Members of SPC for PUD and, later Council, for approval of the New Community Guidebook with the **following refinements**.

A. **Administration Supported Refinements**
    Ongoing liaison with Administration enables recommendation of the following refined policies and illustrations for which we understand we have Administration's support:

1. (a) Modify Reference to 'Policy' as documents indicated are not necessarily "approved Policy"
   (b) Revise Section 4.1.1.b to include a clause that confirms the survival of the ASP "exception" clause in the event of subsequent Guidebook revisions;
   (c) Replace diagram on page 16 with the modified diagram; and
   (d) Revise wording in CAC and MAC section re: integration with other uses horizontally with other sites in the CAC and MAC.

B. **Modifications Requested by UDI without Administration Support**
   UDI requests the following policy modifications for which we have not been able to gain administrative support:

   2. Neighbourhood Density Averaging/Transfer* – include provision for density averaging/transfer in Section 2.2.2.b, page 4. *This was previously approved by UDI and Administration but amended by CPC;* and

   3. Environmental Open Space** – delete (preferred) or revise (see attached) clause 3.4.2.4.e, page 29, as it contravenes the intent of the Guidebook as a consolidation of existing policy. This is a new policy and it appears repetitive. There is Administration support for one change, to add the word "adjacent", but not both changes; and

   4. Street Network - Modify language in 3.1.3.1., page 16, to be less restrictive to culs-de-sac and p-loops and allow for more choice and diversity within efficient and effective neighbourhood design.

C. **Additional Concerns & Requests to be Addressed by Others**
   5. Building Orientation/Parking/Active Façades:
      (a) Modify 2.4.3.e. (i), page 7, to enable convenient access to units for the majority of users;
      (b) Modify 3.1.4.1.a.(ii), page 17, to clarify the active façade as being the one used by the majority of users;
      (c) Modify 3.1.4.1.e., page 18, recognizing that if there is no on-street parking, some on-site parking may have to go adjacent to the street; and
      (d) Parking Design 3.1.5., page 19, should be modified to consider the reasonable and practical use of on-street, structured and underground parking; as well as consider customer convenience in the interface of surface parking with pedestrians, cyclists, transit and building orientation

In addition to UDI's presentation, we understand there will be an Industry presentation regarding Item 5 above on Building Orientation/Parking/Active Facades. In addition, comments regarding the treatment of the EOS features identified at the ASP stage of the planning process will be made. UDI supports the ideas presented in these additional presentations.

Should you have any questions regarding the foregoing, please do not hesitate to contact me.

Sincerely,

Michael Flynn

Michael Flynn
Executive Director

c.c.   Chris Wolfe, Kevin Froese, Scott Lockwood, Travis Shaw; City of Calgary

Footnotes:
* #2 - **Density Averaging/Transfer** - UDI-Calgary had requested the transfer or averaging of density/ intensity be applied at the **Community level**. While this was not resolved between Administration and UDI, Administration acknowledged the ability of staff to look at Community averaging provided the intent of the MDP could still be applied and it is warranted.
 ** #3 - **EOS** - UDI-Calgary supports further investigation and discussion on the subject of the refinement of EOS at the ASP stage to achieve greater clarity for the OP/LU process.

ISSUE 1.(a) – Referenced Policy

Throughout Section 3.0, the Guidebook makes reference to various 'policies'. On closer review, not all of the referenced material is Committee/Council approved policy or even constitutes 'policy' in a strict sense. Accordingly, UDI Calgary proposed to administration to remove the word policy and indicate "building upon the following:" It is our understanding this is acceptable to Administration.

MODIFICATION #1 –
Page 14, Section 3.1 Mobility

The mobility system should encourage sustainable modes of transportation and provide a highly-connected network of paths, streets and transit routes. This section builds upon the following ~~applicable policies~~:

Page 20, Section 3.2 Utilities
These [Guidebook] policies ensure that utility infrastructure will adequately, safely and efficiently service the ultimate development within each Plan Area. This section building upon the following ~~applicable policies~~:

Page 22, Section 3.3 Facilities
Facilities provide......charity or partnership. This section builds on the following ~~applicable policies~~ *(other documents are noted in the relevant sections):*

Page 26, Section 3.4 Open Space Network
The open space network consists of the parks, pathways and natural areas within a community. This section builds on the following ~~applicable policies~~:

ISSUE 1.(b) – Survival of Exemptions or "Notwithstanding"

Section 4.1.1.b provides for an ASP to be able to "exempt itself from specific Guidebook provisions". However, Administration has advised that any subsequent revision to the Guidebook will apply to any prior ASP wherein the Guidebook is referenced. The indiscriminant application of this would effectively 'wipe out' or eliminate the prior ASP exemption or "notwithstanding" clause. We understand that is not the intention and understand Administration would support a modification for clarification.

MODIFICATION #2 –

Page 30, Section 4.1.1.b

b. An ASP may exempt itself from specific Guidebook provisions (and identify different standards) by describing the exemption in the ASP policy. The exemption would be maintained as the Guidebook is amended.

ISSUE 1.(c) – Diagram 400m Radius/Street Design

UDI-Calgary requested the diagram on page 16, illustrating the 400m radius five-minute walk from homes to bus stop (section 3.1.2) be modified to model increased connectivity. UDI-Calgary revised the diagram and, we understand, it can be supported by Administration.

Agreed Modification - Page 16, 3.1.2 Transit Service
(400m Diagram)
Replace the existing diagram on page 16 with the following:

EXISTING
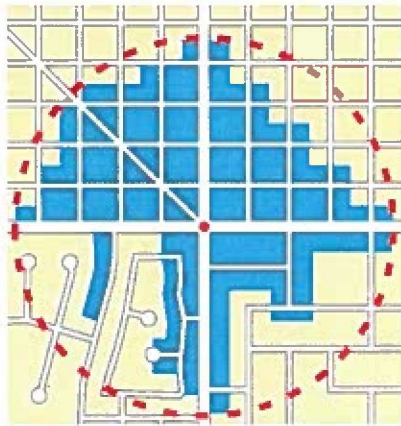
PROPOSED

ISSUE 1.(d) – Clarifying Integration of Mixed Uses Horizontally & Vertically (CAC and MAC)

RECOMMENDED POLICY

Page 8, Section 2.5.2.c (ii) – CAC's

Existing

c. *Commercial development in the CAC:*

   (ii) shall be integrated vertically and/or horizontally with other uses

Agreed Modification

c. *Commercial development in the CAC:*

   *(ii) shall be integrated vertically with other **uses on the same or different** sites within the CAC and/or horizontally within buildings with other uses;*

Page 10, Section 2.6.2.b (ii) – MAC's

Existing

b. *Commercial development in the MAC:*

   (ii) shall be integrated horizontally and/or vertically with other uses;

Agreed Modification

b. *Commercial development in the MAC:*

   *(ii) shall be integrated horizontally and/or vertically with other **uses on the same or different** sites within the MAC and/or vertically within buildings with other uses.*

ISSUE 2. – Neighbourhood Density Averaging/Transfer

Page 4, Section 2.2.2.b

(a) Original Administration Recommendation (as set out on page 4)

2.2.2. Size and Intensity

a. A Neighbourhood should achieve a density of 20 units per gross developable residential hectare
   (8 units per gross developable residential acre).

   i.   An Area Structure Plan (ASP) may identify a Neighbourhood with a lower density if it identifies a Neighbourhood with a higher density. The density of the two Neighbourhoods must average 20 units per gross developable residential hectare (8 units per gross developable residential acre) considering their respective gross developable areas.

   ii. Each ASP shall show the density requirement for each Neighbourhood on a map. Any density averaging between two Neighbourhoods shall be shown on the map. The map should be amended prior to or concurrent with an Outline Plan/Land Use Amendment application where density averaging is proposed.

(b) CPC Recommendation

2.2.2. Size and Intensity

a. A Neighbourhood should achieve a minimum density of 20 units per gross developable residential hectare
   (8 units per gross developable residential acre).

   i.   An Area Structure Plan (ASP) may identify a Neighbourhood with a lower density if it identifies a Neighbourhood with a higher density. The density of the two Neighbourhoods must average 20 units per gross developable residential hectare (8 units per gross developable residential acre) considering their respective gross developable areas.

   ii. Each ASP shall show the density requirement for each Neighbourhood on a map. Any density averaging between two Neighbourhoods shall be shown on the map. The map should be amended prior to or concurrent with an Outline Plan/Land Use Amendment application where density averaging is proposed.
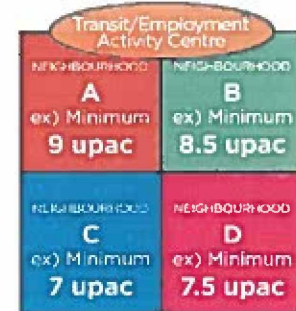
(c) UDI Recommendation

Approve the original recommendation of Administration.

- *Flexibility will encourage more creativity, innovation and distinctiveness between neighbourhoods while maintaining a minimum overall community density.*

UDI DESIRED POLICY

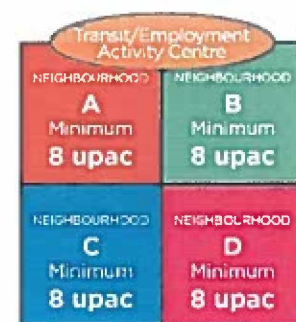Flexibility for more distinct neighbourhood densities if owners and City can agree at the ASP stage

Still maintain minimum of 8 uapc for the whole commumity.

Transit/Employment Activity Centre

| NEIGHBOURHOOD A ex) Minimum **9 upac** | NEIGHBOURHOOD B ex) Minimum **8.5 upac** |
| NEIGHBOURHOOD C ex) Minimum **7 upac** | NEIGHBOURHOOD D ex) Minimum **7.5 upac** |

Note: Community with 4 neighbourhoods

CPC PROPOSED POLICY

Achieve minimum 8 upac for whole community and for each neighbourhood.

Transit/Employment Activity Centre

| NEIGHBOURHOOD A Minimum **8 upac** | NEIGHBOURHOOD B Minimum **8 upac** |
| NEIGHBOURHOOD C Minimum **8 upac** | NEIGHBOURHOOD D Minimum **8 upac** |

Note: Community with 4 neighbourhoods

ISSUE 3. – Environmental Open Space

Parks requested the late addition of one clause prior to CPC which was not reviewed by UDI and Administration together. Subsequent to CPC, it was noted by UDI and Administration that this clause is not present in the MDP or in the 3 ASPs (Keystone, Belvedere or South Shepard) and therefore introduces NEW policy.

It is noted that where land in the EOS Study Area is NOT RETAINED but adjacent to RETAINED EOS, it would proceed in keeping with the "Interface" provisions in Section 3.4.2.5.
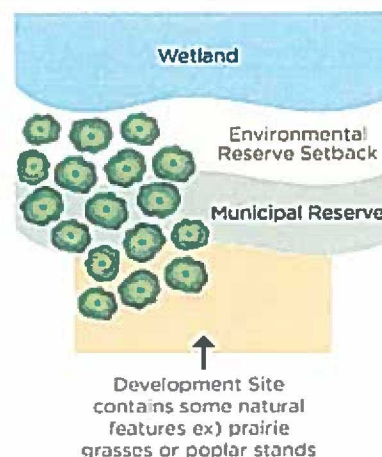
UDI's preferred solution is to REMOVE the clause on the basis it introduces NEW policy and is redundant.

The second option is to refine it; noting that doing so seems to create redundancy with the 'Interface' provisions that follow it.

RECOMMENDED POLICY

Page 29, Section 3.4.2.4.e

e. Development in EOS Study Areas that are not protected as above should proceed in a manner that is sensitive to, and minimize impacts on ecosystem assets.

Wetland

Environmental Reserve Setback

Municipal Reserve

Development Site contains some natural features ex) prairie grasses or poplar stands

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PROPOSED UDI MODIFICATION

(a) Modification - Remove Page 29, Section 3.4.2.4.e

e. Development in EOS Study Areas that are not protected as above should proceed in a manner that is sensitive to, and minimize impacts on ecosystem assets.

– OR –

(b) Modification - Page 29, Section 3.4.2.4.e

e. *Development in EOS Study Areas that are not protected as above* ~~should~~ *be encouraged to proceed in a manner that is sensitive to, and minimize impacts on* *adjacent* *ecosystem assets.*

Note: Parks has agreed to add the word "adjacent" but wants to retain "should". UDI supports the addition of the word "adjacent".

MDP Interpretation (pg 1-12 of MDP) "Policies that use active tense or "should" are to be applied in all situations, unless it can be clearly demonstrated to the satisfaction of The City that the policy is not reasonable, practical or feasible in a given situation."

ISSUE 4. – Block-Based Design, P-Loops and Culs-de-Sac

In order to ensure that we can create unique and diverse communities we need to be able to incorporate a full range of design options. Culs-de-sac and P-loops **can** be designed in an efficient and sustainable manner and should not be dismissed as a design option. There is a significant risk that current wording in section 3.1.3 could be misinterpreted to totally preclude the use of culs-de-sac and P-loops in the design of any future neighbourhood in Calgary.

"Development efficiency is of concern not just to the developer, but also to the municipality, since an inefficient design with a high amount of roadways, or a low lot yield, translates into longer term financial and environmental costs to the general public. At the same time, a balance must be achieved between efficiency and effective design." (Draft. Smart Growth Rating. City of Calgary)

RECOMMENDED POLICY
Page 16, Section 3.1.3.1

1. Block-Based Design

Each Neighbourhood should be designed with a block-based network of walkable streets. Single-access street patterns (p-loops & culs-de-sac) should be avoided; where this is impractical, safe and attractive pedestrian and bicycle connections shall be provide to link streets.

PROPOSED MODIFICATION
Page 16, Section 3.1.3.1
Replace a portion of the paragraph to read:

1. Block-Based Design

Each Neighbourhood should be designed with a block-based network of walkable streets. Single-access street patterns ~~(p-loops & culs-de-sac) should be avoided; where this is impractical, safe and attractive pedestrian and bicycle connections shall be provide to link streets.~~ should be linked by safe and attractive pedestrian and bicycle connections.

ISSUE 5.(a) – Parking for Non-residential Development in the NAC

In order to ensure the non-residential uses are able to have a single 'primary' street level entrance in proximity to parking, as well as pedestrian connections to sidewalks, UDI Calgary requests the below clarification in order to ensure non-residential uses are not required to provide two street level entrances should public parking for the non-residential use be located at the rear of location or other than in proximity to a street oriented public sidewalk.

Feedback from retail/commercial providers indicates logistical, security and economic reasons why multiple entrances are not feasible and the successful model locates a single entrance, where possible, in proximity to customer parking.

PROPOSED POLICY

Page 7, Section 2.4.3.

e. *Non-residential development in the NAC:*

   (i) shall be oriented to the street and have direct pedestrian connections from the public sidewalk to building entrances

RECOMMENDED MODIFICATION

Page 7, Section 2.4.3.
Add the below highlighted text to the existing sentence:

e. *Non-residential development in the NAC:*

   (i) shall be oriented to the street and have direct pedestrian connections from the public sidewalk to building entrances, where there is street parking immediately fronting the non-residential uses or shall be oriented in proximity to customer parking and shall provide convenient pedestrian access from the public sidewalk to the non-residential unit entrances.

ISSUE 5.(b) – Streetscape & Building Facades in Activity Centres & Corridors

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In order to ensure building facades are properly oriented to the site conditions, including pedestrian and cycling access and parking, the below modification is requested.

PROPOSED POLICY

Page 17, Section 3.1.4.1

a. *To provide a high degree of connectivity for pedestrians, cyclists and drivers, the design of transportation network in and around NAC and NC:*

 (ii) should provide a high-quality streetscape with active building facades

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RECOMMENDED MODIFICATION

Page 17, Section 3.1.4.1
Add the below highlighted text to the existing sentence:

a. *To provide a high degree of connectivity for pedestrians, cyclists and drivers, the design of transportation network in and around NAC and NC:*

 (ii) should provide a high-quality streetscape with active building facades where on-street parking is permitted; or a high-quality streetscape where primary entrances are oriented to the parking area away from the public street.

ISSUE 5.(c) – Location of On-Site Parking

A modification of on-site parking is needed in order to ensure parking is only **required** to be behind buildings where there is no street parking immediately in front of the non-residential uses.

PROPOSED POLICY

Page 18, Section 3.1.4.

1. Mobility in Neighbourhood Activity Centres and Neighbourhood Corridors

e. *On-site parking areas should be located behind buildings and not directly adjacent to a (Neighbourhood or Urban) Boulevard*

RECOMMENDED MODIFICATION

Page 18, Section 3.1.4.
Add the below highlighted text to the existing sentence:

1. Mobility in Neighbourhood Activity Centres and Neighbourhood Corridors

e. *On-site parking areas should be located behind buildings and not directly adjacent to a (Neighbourhood or Urban) Boulevard* where there is street parking immediately fronting the non-residential uses. Where there is no street parking, some parking may be allowed adjacent to the street.

ISSUE 5.(d) – Parking Design

A. It is proposed that parking be addressed with more flexibility than the wording in the Guidebook allows. It is recommended that "should" be replaced by "could" in reference to excess parking being allocated to structures or underground. Parking behind street front retail is not preferred to on-street parking.

B. It should not be necessary to specify that parking be located 'away' from transit and pedestrians so long as parking is managed in a manner to ensure there is limited, if any, interference among the three modes.

RECOMMENDED MODIFICATION

Page 19, Section 3.1.5

RECOMMENDED POLICY (Block on bottom left side of page should be revised including new highlighted text as shown below)

The following parking design elements are encouraged within CACs, MACs, Neighbourhood & Urban Corridors.

Street front retail should be supported by locating parking nearby on-street or locating parking at the rear of the buildings. Provision of parking stalls in excess of the minimum requirements should be provided in structures and/or underground parking. Employing strategies that qualify for parking requirement reductions is encouraged.

PROPOSED REFINEMENT

Street front retail should be supported by locating parking nearby on-street or locating parking at the rear of the buildings. Provision of parking stalls in excess of the minimum requirements ~~should~~ are encouraged to be provided in structures and/or underground parking where practical. Employing strategies that qualify for parking requirement reductions is encouraged.

RECOMMENDED POLICY (Block on right side of page should be revised including new highlighted text as shown below)

The following parking design elements are encouraged within CACs, MACs, Neighbourhood & Urban Corridors.

Surface parking facilities should be located away from transit and pedestrian areas and be designed to provide safe, convenient sidewalk and pathway connections for pedestrians and cyclists to access building entrances.

PROPOSED REFINEMENT

The following parking design elements are encouraged within CACs, MACs, Neighbourhood & Urban Corridors.

Surface parking facilities should be located ~~away from transit and pedestrian areas~~ and ~~be~~ designed to provide safe, convenient sidewalk and pathway connections for pedestrians and cyclists to access building entrances and so they reduce interference with transit and pedestrian areas but are in close proximity to building entrances.