



September 20, 2018

Calgary Planning Commission



**Re: Developed Areas Guidebook (DAG) Updates**

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. As a partner organization of the City of Calgary, we work to liaise between communities and Administration. In the case of the DAG, we agree that more piloting needs to be completed and reported on before high-level policy changes come into effect.

Amendment to policy 9.2.3 (b) (ii) to ensure that the Guidebook takes precedence indicates that this document is going to drive development in the developed areas forward. The Federation specifically has concerns about the authority of the document and it's potential to predominate Local Area Plans. This document was originally introduced as a complement to existing policy, and not as an authoritative document at the highest level of our planning hierarchy.

Communities are concerned about these high-level changes because the ramifications are potentially drastic, yet not fully understood. The DAG lists building blocks with their height and uses, but communities are unclear about what is being proposed and exactly where in Calgary it is being proposed. Public Engagement best practices need to be followed and exceeded, especially in the case of documents at the top of the planning hierarchy. This document represents a massive change which must include robust public engagement on a community-by-community basis.

Currently, there are many unanswered questions around how the DAG and District initiatives will roll out. Where will these changes take place and when? How will the next phases of engagement manifest and how will the feedback be used? Is there a guide to implementation or interpretation? How will these policy clauses take form in our Land Use Bylaw? What is the future of the Local Area Plan considering these changes? To what degree will the various policy documents come to bear on specific communities? What tools do communities have work with in the interim as development proceeds? In discussions, it sounds as though the Area Redevelopment Plan may have the ability to prevail over the DAG. This does not make sense considering basic principles of municipal law and policy document hierarchy. How will various City Planners interpret these documents when assessing various applications?

T 403.244.4111  
F 403.244.4129  
E [fcc@calgarycommunities.com](mailto:fcc@calgarycommunities.com)

[calgarycommunities.com](http://calgarycommunities.com)





Applying additional policy documents at the upper levels of the planning hierarchy in the absence of (or in contradiction to existing and recently updated) Local Area Plans is cause for concern. Communities view their Local Area Plan as their primary planning document. In fact, the Development Authority requests that communities' comment on Development Permit applications based on their Local Area Plan. When policies at upper levels of the planning hierarchy conflict with, override, or completely reconstitute them, this creates frustration. How can we build more trust in the planning process in Calgary?

After expressing these concerns to the DAG team yesterday, it was proposed that a working group be convened with Tammy Henry and Stephen Pearce's group (Land Use Bylaw Changes, Calgary Growth Strategies) to discuss the changes concurrently. This type of working group has been successful thus far, and we welcome the opportunity to collaborate. This work should be done concurrently with robust public engagement with the broader public. Detailed engagement must also take place with the specific communities that will be affected (ie. Where exactly will the building blocks go in your community?).

In theory, the instigation of the DAG has the potential to promote developed areas -wide standards. There is an opportunity to build consensus among community members by communicating what the costs are of the alternative (continually building out), as well as the benefits of a dense urban form (improved amenities, commute times etc). The Federation acknowledges that policy documents should not contradict one another, and that Administration must make changes to align with the MGA. Nonetheless, communities must be given opportunity to provide educated and meaningful input on both the overall vision as well as the specific aspects which will affect their community. This ensures buy-in and trust among all affected parties. In terms of how the proposed updates will manifest in reality, the alignment between the DAG, Local Area Plans and the Land Use Bylaw should be proven and reported back on before high-level policy changes come into effect.

Sincerely,

Jennifer Miller  
Urban Planner

Ben Morin  
Urban Planner

