



September 25th, 2019

Planning and Urban Development Committee

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

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

Engagement

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

Consistency and Terminology

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

Status of Implementation Tools / Related Projects

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

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Unlimited Discretionary Power

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

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

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

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

Process / Scope Changes

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

Summary

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

Sincerely,



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