



November 28, 2018
Calgary City Council

Re: Developed Areas Guidebook (DAG) Updates

The Federation of Calgary Communities 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, more engagement and piloting must be completed and reported on before these high-level policy changes take effect.

The Federation specifically has concerns about Amendment to policy 9.2.3 (b) (ii) to ensure that the Guidebook takes precedence. Previous versions of the guidebook have stated that Local Area Plans (LAPs) take precedence.

The DAG was originally introduced as a guidebook, and not as an authoritative document at the top of our planning hierarchy. The word guidebook indicates flexibility, while a statutory document at the level of the Municipal Development Plan indicates that the DAG will take precedence in the case of discrepancy.

Enabling language in the DAG must allow Local Area Plans to prevail. In the absence of updated LAPs, higher level policy documents have been used as a blunt tool. It is important that the unique aspects of Bridgeland, Inglewood and Hillhurst Sunnyside, for example, are retained and enhanced through robust LAPs.

There are currently conflicts between recently updated LAPs and the DAG. For example, page 49 of the Proposed International Avenue Area Redevelopment Plan (ARP) states, "[w]here policies within the Developed Areas Guidebook and this policy plan are different, the difference is intentional and not an inconsistency because policy has been tailored to the International Avenue ARP". The amendment before Council to ensure that the guidebook takes precedence will create confusion and conflict among planners, developers and community members.

The DAG represents developed-areas wide density increases which must be prefaced by hearty public engagement. The changes being proposed are not at all understood by communities. People first need to understand what the DAG is proposing and exactly where it is being proposed. Communities must be given opportunity to provide educated input on both the overall vision as well as the specific aspects which will affect their community. In terms of how the proposed updates will manifest on the ground, alignment between the DAG, LAPs and Land Use Bylaw should be proven and reported back on before such broad changes take effect.

Sincerely,

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