

April 28, 2021
The City of Calgary
Standing Policy Committee on Planning & Urban Development
800 Macleod Trail SE
Calgary, AB T2P 2M5

Attention: Chairperson, Councilor Jyoti Gondek
Mayor Nenshi - Ex-Officio
City Councilors
Madam Chair,

Re: Guidebook for Great Communities

The West Hillhurst Community Association has been actively involved in the Guidebook development process for the past several months. We have attended City-sponsored Guidebook meetings and reviewed the amendments proposed by a number of Calgary communities and organizations. We appreciate the hard work of citizen volunteers and City staff alike. While we support the general intent of the Guidebook and recognize the need for guidelines that will guide sensitive densification and diversity in new Local Area Plans, West Hillhurst believes that the Guidebook still requires significant additional work and should be sent back to administration for further revision and public consultation. We can support approval of the Guidebook only if substantial revisions are made on the basis of meaningful and representative public input.

In addition to the constructive amendments proposed by a variety of Calgary communities and organizations, there are four we wish to highlight:

- 1) **Reform of the public engagement process** is critical. While we have no doubt planning staff followed accepted engagement procedures, the problem is the City's engagement process itself, which has deep and systemic deficiencies. Engagement events only reach a small subset of the broad public and many distinct publics seem to be largely or completely absent from the process. Determining whether engagement has captured something approaching a representative sample of Calgary's citizens is currently impossible, since the City does not collect demographic data on event participants. Such data should be collected for each event and compared to the demographic profile of the community in which the event is held. If participation is significantly unrepresentative, it is incumbent upon the City to actively seek out the voices that are not being heard. Determination of sufficient and representative participation should be based on clearly defined benchmarks.
- 2) An **effective strategy to ensure housing affordability** is desperately needed. While densification provides a number of benefits, improved housing affordability is not one of them. A densification strategy that relies solely on market mechanisms has been shown to result in higher housing costs in established communities, exacerbating the already extreme social and spatial polarization of Calgary. The Guidebook's aspirational statement touting a diversity of housing types and densities does not constitute an actual mechanism to produce affordable housing, nor does it ensure the equitable distribution of affordable housing opportunities among communities. Affordable housing policies should also be sensitive to the needs of under-served groups, such as seniors and young families. In contrast to Calgary, Edmonton has tackled the affordable housing problem head-on, adopting a policy of a minimum of 16% affordable housing in every community. Edmonton's policy is a good starting point, although we believe the City should strike a committee to address both housing affordability targets and mechanisms to achieve them, including land value capture mechanisms (capturing land

value increases created by the City's densification policies) to produce and/or fund affordable housing. There is a substantial planning literature on land value capture, including recent research by both the Urban Land Institute and the Lincoln Institute of Land Policy. To date, the City of Calgary has not considered means to capture publicly-created land value increases for public good; if not addressed, this could represent one of the biggest missed opportunities in the history of the City.

- 3) Relatedly, and in addition to the need for the equitable distribution of affordable housing across the city, **an effective strategy for equitable provision of public amenities and infrastructure across communities** is desperately needed. Calgary is increasingly characterized by inequity and polarization; this needs to be addressed as part of the Local Area Planning process, which means there need to be clear guidelines addressing social and spatial equity in the Guidebook. These guidelines should set benchmarks for access to active and public transportation, recreation and parks, healthy food, and more.
- 4) The Guidebook should introduce **solar access as one of the principles guiding the development of new Local Area Plans**. Access to sunlight is an important consideration in a city that has six months of winter; it is especially important given the promotion of photovoltaics, community gardens, and desirable and active public spaces. Solar access regulations are common in many parts of the world, including the United States. The City of Calgary already requires shadowing studies for most major developments in established communities, but then ignores those studies when making development approval decisions. The exception is in the downtown, where solar access principles have been utilized to protect access to sunlight along the river pathway. Solar access principles are not intended to stop development, but rather help guide where density goes, providing certainty to residents and developers alike. Moreover, thoughtful and context-sensitive solar access regulations will mitigate many of the current objections to densification. Solar access should be addressed in the Guidebook, although actual regulation of solar access would need to be addressed through the zoning bylaw.

We strongly believe these are critical concerns that must be addressed in the Guidebook, and strongly encourage City administration to take the time needed to rectify these omissions.

Sincerely,

The West Hillhurst Community Association Planning Committee