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March 15, 2021

The City of Calgary P.O. Box 2100, Stn. M Calgary, Alberta T2P 2M5

Attention: Mayor Nenshi and City Councillors

Dear Mayor Nenshi and City Councillors,

Re: Brentwood Community Association and Development and Transportation Committee (DTC) Public Submission on Guidebook for Great Communities ("the Guidebook")

Members of the Brentwood CA wanted to like the Guidebook.

We had high hopes for the idea of a multi-community planning process in which we would participate with other District 14 communities in planning for future growth. But somehow the Guidebook became too far-reaching and too remote from the reality in Brentwood and other established communities. With each revision of the documents (see next page), there appeared to be greater and greater focus on densification and high-use areas at the expense of contextually sensitive redevelopment or community character.

We no longer see our community reflected in the Guidebook.

Brentwood has been named the #1 community by Avenue magazine readers for 2 years in a row, proof that we already have a pretty "great" community. Most Brentwood homes are in areas designated as R-C 1 (Residential — Contextual One Dwelling Districts), defined in LUB1P2007 as "intended to accommodate existing residential development and contextually sensitive redevelopment in the form of Single Detached Dwellings in the Developed Area."

Yet we do not see any illustration in the Guidebook that looks like what residents like best about our community.

The illustration for the Limited Scale Development shows only attached homes and many three storey buildings.

There are no detached homes shown, no detached garages, no laneways (alleys), no bungalows....
In short, there are no building forms that reflect our community at all.

We realize that this is an illustration only, but if an illustration is to represent a building category (in this case the Neighbourhood Local, then this looks nothing like our community. This presents a very drastic change which was not presented in earlier versions of the DAG or Guidebook (next page).





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#### How did we get to here?

- Previous Guidelines such as the "Low Density Residential Housing Guidelines for Established Communities"
  (Dec 2010) placed a strong emphasis on "encouraging development to respect and enhance the overall
  quality and character of the street / community in which it takes place": it provided very specific design
  element considerations for "sensitive and quality redevelopment ... of established communities" (pages 7-8).
- The Developed Areas Guidebook was created in 2017.
- Amendments to the DAG were presented in 2018, along with the warning:
   "More significant changes to the Guidebook are being considered than were originally anticipated following the approval of the Guidebook (the DAG) in 2017."
- One of the changes was significant: "Local Area Plans may outline a finer level of detailed policy than what is provided in the Guidebook, and the exemption would be maintained as this Guidebook is amended from time to time. In the event of any conflict between a Local Area Plan and this Guidebook, the Guidebook takes precedence." (previously, the LAP takes precedence)
- The DAG work ceased, and a "Guidebook for Great Communities" was released in September 2019.
- The current version was not released until January 2021. **Another drastic change was presented in the form of Zone A or Zone B, supporting Residential Intensity according to location.**

#### **Engagement Concerns:**

The revisions have not adequately addressed concerns repeatedly expressed by CAs over the past year, and the recent addition of Zone A and B was unexpected even to CAs who have been actively involved.

"The Guidebook also considers more than five years of information collected from engaging with citizens through hundreds of planning projects." <a href="https://www.calgary.ca/pda/pd/current-studies-and-ongoing-activities/guidebook-fags.html">https://www.calgary.ca/pda/pd/current-studies-and-ongoing-activities/guidebook-fags.html</a>

However, the "hundreds of planning projects" on the website all took place between 2015 – 2020. The recent Guidebook version was not released until January 2021.

Anyone attending an earlier information session would not have been informed about the Zone A and B changes, among others. While we appreciate that some of the changes are in response to feedback received by the City, other changes are not. Earlier engagements on different versions do not reflect the current proposals. These are major changes and they require greater engagement, explanation and transparency.

#### **Brentwood CA Top Concerns and Recommendations:**

1. The Urban Form and Scale Categories identify the lowest urban form as including up to 3 storeys and up to townhouses or rowhouses.

The Guidebook does not include a category for single detached homes. The LUB section guiding the height of a 3-storey building will not be amended until after the Guidebook is approved.

Many homes in Brentwood are bungalows, and there are no 3-storey homes at all. The proposed build form is completely out of character with the homes in our community. This contradicts the Infill Guidelines' emphasis on "encouraging development to respect and enhance the overall quality and character of the street / community in which it takes place".

This issue has a FAQ from www.calgary.ca/guidebookfacts

"Why isn't there an urban form category for single detached homes? Will entire streets remain single detached homes?



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#### Answer:

Urban form categories capture the broad range of building types and uses that may generally occur in an area. Neighbourhood Local areas may be predominantly single detached dwellings, but may also include other types of homes such as rowhomes, semi-detached, fourplexes and even apartment buildings mixed in. The Guidebook includes policy encouraging the sensitive integration of new buildings with their surroundings.

However, as is the case today, many streets will experience limited or no redevelopment and any redevelopment is initiated by individual property owners."

**Recommendation:** "Sensitive integration" requires an additional Urban Form Category to include a scale modifier that is RC-1 or single detached dwelling.

#### 2. Lot coverage and loss of trees / greenspaces

Brentwood is known for large, mature trees, including many fir and spruce trees which grow best where they have room to spread out. R-C1 properties can have buildings covering only up to 45% of the property, while R-G (includes townhouses) allows up to 60%. Existing areas with large trees and greenspaces may lose much of the tree canopy and greenspace. Privacy / overlooking / massing are also concerns.

**Recommendation:** Retain the lot coverage at 45%, even in cases of a change of land use to another building form.

#### 3. The lack of contiguous areas of R-C1.

In new greenfield communities, developers delineate types of housing and plan entire blocks of exclusively R-1, or R-2, or other housing forms. They don't mix and match on every block. Many new areas have R-G land use, which allows for a variety of housing forms, yet similar housing forms are placed together (i.e. an "estate" area of single family homes).

When developing new communities, a developer will control what will be developed on each lot as they would not be able to sell a single family home without identifying what will be built next door. They do not have the same concern in an existing community as they have no vested interest in the home next door.

In a new community, the first question a purchaser of an empty lot is going to ask is, "what's going to be built next to me?" The purchaser of a single family homes is unlikely to want a 3-storey townhouse next door (and if he does, then the price will reflect that). The purchaser of a townhouse may hesitate if a tower is to be built next door. Certainty is important.

In essence, the buyer is purchasing not only his own property, but some assurance as to the build form next door. (An analogy is choosing a non-smoking seat in a restaurant. There is a reasonable expectation that the seats around you will also be non-smoking. It is not only "your" seat that matters, it is also about what is around you.) **Recommendation:** During the LAP process, allow for contiguous areas of R-C1.

### 4. The definition of "connector" streets.

Greater density is to be placed on connectors, but some communities don't have housing located directly on the major connectors within their area (example: Brentwood is bounded by major thoroughfares such as John Laurie, Shaganappi, Northland and Crowchild, but none of them have housing directly on them). Therefore, the next buildable "main" streets are much smaller, local streets (Northmount, Brisebois, Capri) lined with R-1 houses.

The Scale Category beyond "Limited" is "Low" and allows for 6-storey building. The Mid Category would allow for a 12 storey. This is a huge difference compared to the bungalows on many of those streets.

**Recommendation:** Greater clarity on how connector streets are selected in areas without direct access from the main streets and roadways in their neighbourhood.



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### 5. The Guidebook would override existing ARPs where density has already been planned.

ARP materials will be "transferred over" into the LAPs, but each community's carefully planned ARP will be replaced with a multi-community model involving up to a dozen or so communities. While some multi-community planning is welcomed, there is little consideration of the unique features in each community.

The Brentwood Station ARP was finalized in 2009 and referenced "Areas of Change and Stability" as a core concept. The central theme was that some areas (around the LRT on all sides) would experience significant change, and other areas would remain largely unchanged. The densification would occur within the SARP area, leaving other areas of Brentwood as predominantly R-C1. Large areas of buildable land remain undeveloped at the TOD area and residents welcome further development there.

**Recommendation:** The Guidebook focuses on how to create great communities but not how to sustain the great communities we already have. Community character considers the pattern of streetscape, architectural details, scale and massing, and natural features that create an "experience" that is recognizable as a sense of place. The SARP captured this in detail that a broader Guidebook cannot.

#### 6. Larger-scale redevelopments

Density was already planned in many communities for central areas (Currie, Brentwood TOD, Dalhousie Coop, Stadium Shopping Centre, University District, etc.). Those areas had detailed plans and community engagement and the larger scale projects were planned as the highest areas of redevelopment. Victoria Park or East Village areas require large demand and will not be built if redevelopment occurs in bits and pieces everywhere else. In Brentwood, Northland Mall is undergoing redevelopment, including the addition of 6-storey residential buildings. The BCA has supported that redevelopment.

**Recommendation:** Focus on the larger scale projects to ensure their completion. They are less likely to move forward if there are small pockets of redevelopment scattered throughout broader areas.

In closing, the BCA respectfully requests that Council direct the Administration to consider our comments and recommendations to make changes in the Guidebook. Furthermore, we would like further engagement with communities and community associations for any proposed amendments.

Thank you for your consideration of our feedback.

Sincerely,

**Brentwood Community Association Board members:** 

Bonita McCurry, President

Kirk Osadetz, Vice President

Lisa Boychuk Treasurer

Melanie Swailes
Peter Johnson
Development and Transportation Committee