



April 10, 2008

To Calgary City Council:

Mayor David Bronconnier
Alderman Joe Ceci
Alderman Andre Chabot
Alderman Diane Colley-Urquhart
Alderman Joe Connelly
Alderman Druh Farrell
Alderman Linda Fox-Mellway
Alderman Bob Hawkesworth
Alderman Dale Hodges
Alderman Ray Jones
Alderman Gord Lowe
Alderman John Mar
Alderman Rick McIver
Alderman Brian Pincott
Alderman Jim Stevenson

Regarding: FCC comments on proposals for Special Care Facilities and Non-Market Housing (Council April 14)

Dear Members of City Council,

The Federation of Calgary Communities appreciated the opportunity to work with agency stakeholders, the City, and representatives of several community associations on the combined stakeholder project that has led to the proposed *Planning Principles and Additional Measures to Guide the Location of Special Care Facilities, Shelters and Non-Market Housing*. This was a productive exercise that increased understanding and generated considerable agreement, leading to a desire for more collaboration. The Federation wants to thank the participants and congratulate them on the work done so far.

The Federation of Calgary Communities supports the proposal as a major step forward in clarifying rules, providing reasonable guidelines, and creating the conditions for greater acceptance and success in the placement special care facilities and non-market housing. All stakeholders agreed that there needed to be a “triangle” of collaboration between the City, agencies and communities when dealing with these issues to ensure a positive outcome. From the Federation’s point of view, the recommendations go a long way toward facilitating that triangle.

The Federation supports the creation of distinct uses for different kinds of facilities, as opposed to the approach under 2P80 of having a single “special care” use (Recommendation A.1.b - Appendix IV, part 1). Distinct uses provide greater clarity to development applications, and ensure that community consultation happens when one use changes to another. We agree that

projects should be judged on individual merits. Clearly defined uses help to inform planner discretion, and community and resident deliberation, when making such judgements. They are also useful to applicants when planning a project. (So it is with all kinds of projects, not just those regarding special care facilities.)

One disadvantage of a single omnibus definition is that neighbours may oppose “special care facility” applications of all sorts on the chance that they could be converted to a detox centre or half-way house (for example) without community notification, consultation, or the involvement of the planning department. We believe that the clarity provided by distinct and separate uses will aid agencies in securing resident, community and City acceptance, and help them to place necessary facilities in the community with less controversy and more understanding.

The stakeholders discussed changes to the “minimum and maximum” resident size rules in the land use bylaw, which may provide more flexibility to agencies without having a lot of community impact. The community representatives were generally supportive of this direction, but there may be consequences to such changes that have not been fully explored, and therefore Administration has recommended further investigation with the stakeholders (Recommendation A.1.b - Appendix IV, part 2). The Federation believes this a reasonable approach and looks forward to participating in that further discussion.

The Federation of Calgary Communities also supports the recommended *Planning Principles to Guide the Location of Special Care Facilities and Shelters* as a useful document (Recommendation A.1.a - Appendix I). The notion of discouraging over-concentration of facilities and looking at cumulative impacts has previously been raised by communities, and we are pleased to see it addressed. The flip side is that facilities of many kinds need to find homes all over Calgary (as they do now). Guidelines that recommend appropriate sizes, forms and locations will be helpful in this regard, and such information should help to smooth the development application process for agencies, communities and the City.

For similar reasons we support the *Proposed Locational Principles for Non-Market Housing* (Recommendation 2, Appendix III). While the combined stakeholders agreed on the principles here, there was not consensus on what (or whether) “numbers” should be applied. For example, there is principle 6 that “for smaller projects (up to 40-60 units), up to 100% of units may be rent-geared-to income” and principle 7 that “any project over 40-60 units should be encouraged to have a mix of market and non-market housing, preferably with at least a 1:1 ratio...” From the Federation’s point of view, this is more suggestive than proscriptive. Regardless, without some numbers being applied in the document, the intent can be misinterpreted. Subjectively, someone could assume that a 10 unit project is “big,” while another might think a 100 unit project is “small,” but neither would be an accurate interpretation of what the principles were trying to communicate.

Good bylaws and guidelines are helpful, but the solution to locating needed facilities more smoothly, and improving Calgary’s social environment overall, also requires some educational efforts and ongoing collaboration among agencies, the community and the City. Several

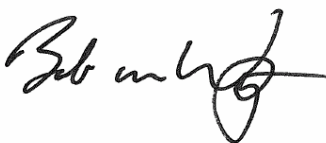
important additional measures are related to Recommendation A.1.c., and listed in Appendix II. One recommendation (number 7) is the development of a “Guide for Applicants” to help agencies (that are usually not experienced in the planning process) to work with the City and communities. Another (number 5) is to “arrange and/or encourage, perhaps through other agencies such as the Federation of Calgary Communities and the Calgary Homeless Foundation, ongoing public awareness and education programs to address public perception issues.” In that spirit, the Federation is hosting a presentation by the Calgary Homeless Foundation to community association leaders on the 10 Year Plan to End Homelessness on April 29.

We ask that Council support the various recommended actions in the report, and provide resources as appropriate.

To conclude, community associations typically want to be consulted on planning and development issues, they want a clear understanding of what is being proposed, they want reasonable rules and guidelines for informing decisions, and they want to be able to work with the City and applicants to sort out the issues. All of these things help us to judge development applications on their merits. There is still work to do, but in our view, the proposals outlined in *Planning Principles and Additional Measures to Guide the Location of Special Care Facilities, Shelters and Non-Market Housing* are a good step forward in providing a framework for planning decisions and a better relationship between agencies, communities and the City on these issues. An important outcome of all this is an improved ability to place needed special care facilities and non-market housing in welcoming communities.

Thank you for your consideration.

Sincerely,



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