



Public Submission

City Clerk's Office

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- I have read and understand that my name and comments will be made publicly available in the Council agenda. My email address will not be included in the public record.

First name (required)	Zaakir
Last name (required)	Karim
What do you want to do? (required)	Request to speak, Submit a comment
Public hearing item (required - max 75 characters)	LOC2020-0048 and DP2020-3537 at PUD
Date of meeting	May 5, 2021

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The Cliff Bungalow-Mission Community Association (CBMCA) opposes this application for the following five reasons.

1. Application is effectively a request for an in-kind subsidy without commensurate public benefit. The Applicant is requesting ~\$728,000 of in-kind subsidies in the form of additional density rights in order to build upscale housing. In return, the Applicant is providing nothing in the way of public benefits. As such – even if councilors believe the project has merit from a planning and development perspective, the Applicant should have to pay for the additional density rights.
2. Insensitive to context. The proposed development is not sensitive to its context and will not complement adjacent properties, all of which have complied with the FAR and height regulations outlined within the Mission ARP.
3. Direct conflict with ARP. The proposed development is in direct conflict with the objectives, intent and policy of the Mission Area Redevelopment Plan (ARP)
4. Does not further City's policy goals. The proposed development does not support the goals of City of Calgary policy documents
5. Is not a sound approach to community building. The proposed development does not represent a sound approach to community building.

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Unrestricted

Apr 28, 2021

11:58:12 AM

CLIFF BUNGALOW-MISSION COMMUNITY ASSOCIATION

462, 1811 4th Street SW
Calgary Alberta, T2S 1W2
Community Hall & Office Located at 2201 Cliff Street SW
www.cliffbungalowmission.com | cbmca.development@gmail.com



April 28, 2021

Re: LOC2020-0048 and DP2020-3757

Address: 306-312 25 Avenue SW

COMMUNITY ASSOCIATION POSITION ON THE APPLICATION

Much of Mission is zoned to allow a maximum height of 5 storeys for residential buildings. This is a result of the land-use district (DC63Z2006) created by the approval of the Mission Area Redevelopment Plan (ARP) by the City of Calgary in 2006.

In April 2020, O2 Planning + Design submitted a concurrent Land Use Amendment and Development Permit application for a parcel of land located on 25th Avenue SW near 2nd Street. The application seeks to redesignate (upzone) the parcels located at 306-312 25th Avenue SW in order to build a seven (7) storey building.

The Cliff Bungalow-Mission Community Association (CBMCA) opposes this application for the following five reasons.

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2. **Insensitive to context.** The proposed development is not sensitive to its context and will not complement adjacent properties, all of which have complied with the FAR and height regulations outlined within the Mission ARP.
3. **Direct conflict with ARP.** The proposed development is in direct conflict with the objectives, intent and policy of the Mission Area Redevelopment Plan (ARP)
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5. **Is not a sound approach to community building.** The proposed development does not represent a sound approach to community building.

1 – The application is implicitly a request for the City provide to provide the Applicant with a large in-kind subsidy (in the form of additional density); however, the applicant offers no incremental material public benefits to justify this subsidy.

We estimate the market value of the additional proposed density at \$728,000 using comparable sales in the neighborhood.¹ The Applicant is not proposing any incremental public benefits that would rationalize this in-kind subsidy.

As such – even if City Councillors believe the project has merit from a planning and development perspective – there is no public policy rationale to provide the Applicant with the in-kind subsidy of increased density at no cost. To do so would be poor public policy. Instead, the Applicant should have to pay \$728,000 for the density.²

We realize the Applicant has outlined a few rationales of why upzoning is in the best interest of the City. We vehemently disagree with the Applications assertions and outline our rationale below.

A. Based on details within the DP application, the additional density will result in a larger building, but will not increase housing supply. This is best illustrated with a peer comparison between the proposed project and an approved project that is of the same parcel size, under-construction and located less than 30m away, along the same avenue. Compared to the peer project, **the Applicant’s proposal would provide the City with 28% LESS HOUSING SUPPLY while concurrently requiring 28% MORE DENSITY**

- **Proposed project.** Delivers 44 dwelling suites over seven-storeys.
- **Peer Project.** Delivers 61 suites over five-storeys.

	Applicant's project	Peer project
Application	LOC2020-0048 / DP2020-3757	DP2019-4606
Address	306-312 25 Avenue SW	320 25 Avenue SW
Status	Proposed	Under Construction
Parcel size	13,000 s.f.	13,000 s.f.
Storeys	7	5
FAR	4.5x	3.5x
Number of suites	44	61

Table 1. Comparison of proposed application with approved project under construction. The peer project, which stays within allowable density, provides the City and community with more housing supply.

¹ Based on comparable sales in the neighborhood, the value of density in Mission has sold at an average of \$56 per buildable square foot since 2015, the most recent sale being at \$78 per buildable square foot in August 2020. This parcel is 13,000 square feet and the applicant is asking for upzoning from 3.5 FAR to 4.5 FAR. The value of this request is \$728,000 (equal to \$56 x 13,000 sf x 1 FAR).

² These funds should be used to provide community amenities to the Mission-Cliff Bungalow neighborhood.

- B. Based on the proposed DP, the additional density increases “housing diversity” through the provision of luxury housing.** The proposed development calls for 44 large, upscale suites. Thus, the additional requested density would increase “housing diversity” through the creation of large, expensive suites marketed to affluent consumers. This is the opposite of an affordable housing project.

The Community Association is not opposed to upscale housing development; it is however, opposed to large in-kind subsidies for the provision of upscale housing. Subsidizing upscale housing is poor public policy for two reasons. First, it is regressive. Second, it biases development towards less affordable development.

2. The proposed application is not sensitive to its surrounding context and will not complement adjacent properties

Land use zoning by definition means there are boundaries where the City and stakeholders have defined the uses and allowable forms that protect and enhance neighbourhood character. One of those boundaries is 25th Avenue: buildings on the south side of the street have an allowable FAR of ~5, while buildings on the north side of the street have an allowable FAR of 3.5.

2A - Context of neighboring buildings

Below we provide a description of the height and massing of the neighboring buildings around the parcel. Given the context, we believe the proposed seven-storey building for this site is difficult to justify.

- **Adjacent property to the east.** The applicant’s parcel is bordered by a 2.5-storey building to the east. A photo of this building is shown below.



- **Adjacent property to the west.** The applicant's parcel is bordered by a 3-storey building to the west. A photo of this building is shown below.



- **Adjacent property to the north.** The applicant's parcel is bordered by a 5 storey building to the north. A photo of this building is shown below.



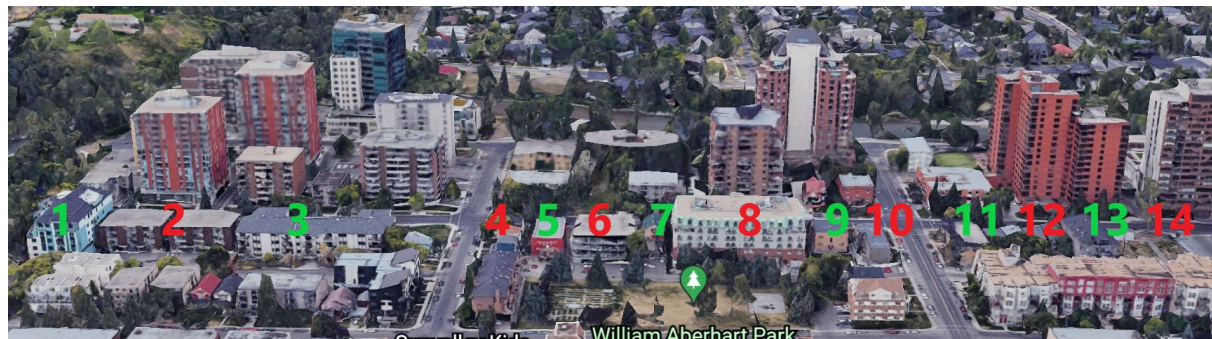
- **Adjacent property to the south.** The applicant's parcel is bordered by two different buildings to the south. Roughly 75% of the applicant's parcel is bordered by a three-storey building. Roughly 25% of the applicant's parcel is bordered by a 13-storey building.



2B - Context of the North side of 25th Avenue SW

The context of the application site on the north side of 25th Avenue consists of two- to five-storey buildings – including Edwardian era houses – for almost the entire length of 25th Avenue in Mission. This avenue, initiated at its eastern end by the historic Scollen Bridge, is considered a character streetscape and gateway into the community.

Below, we have provided an outline of this entire streetscape along the north side of 25th Avenue, where this parcel is located.



As detailed, below – outside of the mixed-use building on the main-street (fourth street) – all of the buildings on the North side of 25th Avenue are 6 storeys or less.

Building Type	Height	Building Type	Height
1 Multi-family	Five-Storey	8 Retirement Residence	Six-Storey
2 Multi-family	Four-Storey	9 Multi-family	Three-Storey
3 Multi-family	Four-Storey	10 Multi-family	Two-Storey
4 Single Detached	Two-Storey	11 Multi-family	Three-Storey
5 Multi-family	Three-Storey	12 Multi-family (proposed)	Seven-Storey
6 Multi-family	Four-Storey	13 Multi-family	Four-Storey
7 Single Detached	Two-Storey	14 Multi-family (under construction)	Five-Storey

Table 2: List of heights and types of residential buildings along south side of 25th Avenue SW

In the chart below we have summarized the heights of the existing residential buildings by massing. As we can see, most of the buildings are between 2-5 storeys and none are above six-storeys in height.

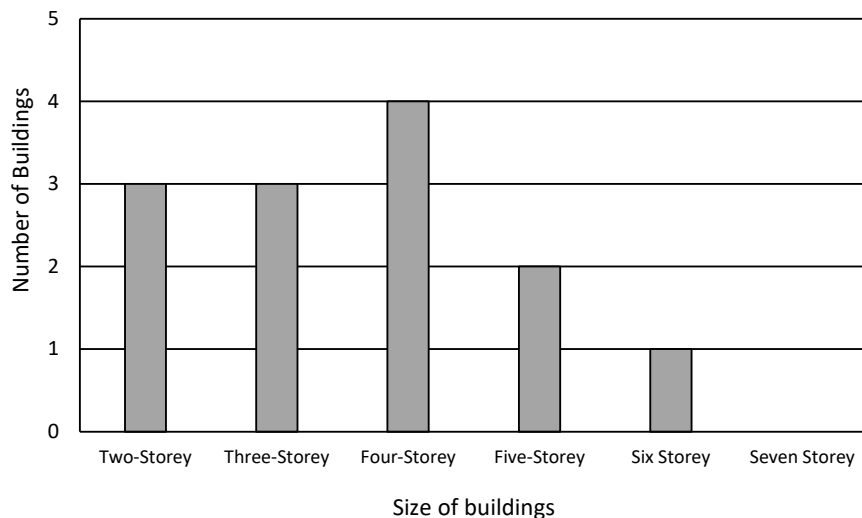


Chart 1: Histogram of existing residential building heights along south side of 25th Avenue SW in Mission neighborhood

Based on the representation above, it is clear that the proposed application is neither justified based on arguments of “context” nor on the arguments of a proposed or already existent “transition zone.”

3. The proposed Application is in direct conflict with the objectives, intent and policy of the Mission Area Redevelopment Plan (ARP)

This application for spot upzoning under the guise of ‘transitioning’ does not constitute good planning practices. **It is an arbitrary and damaging application to change land use for a relatively small parcel at variance with a comprehensive community-wide plan.**

A seven-year process involving the community association, area residents and City of Calgary employees, with the assistance of an external consultant and the University of Calgary Faculty of Environmental Design, resulted in a land use policy that would ensure the continued vitality of the community through inevitable growth and change and still retain a ‘sense of place’ and cultural context. One of its major platforms was a medium high density residential policy allowing a maximum density of 3.5 FAR with a maximum height of five storeys. The Mission Area Redevelopment Plan (ARP) accommodates considerable growth and densification while retaining the essential character and liveability of the community.

The DC zoning that was established in 2006 for the majority of Mission was designed to protect, encourage and perpetuate the unique history and character of the neighbourhood. City Council, in setting a maximum height of five floors in that DC zone, acknowledged that considerable density could be achieved in Mission while respecting and conforming to the existing scale and traditions in the community.

Mission Area Redevelopment Plan relevant sections:

3.2 Goals of the ARP

The goals of the Mission Area Redevelopment Plan are:

2. To establish a policy framework for sensitively managing growth and change within the context provided by the Municipal Development Plan (The Calgary Plan) while maintaining and protecting the special historical character of the community;
5. To encourage new residential and commercial development to be compatible with the special character of Mission.

3.3 Guiding Principles of Smart Growth

- Encourage growth in existing communities by finding ways for new development to fit in with the older neighbourhood.

6.1.1 Context

- The medium high density residential sector between 2 and 4 Streets SW and 18 and 25 Avenues SW contains a substantial number of older, distinctive homes and apartments. This sector is subject to a number of policy changes addressing the *special character of the community, affordability, mobility and quality of life*.

6.1.2 Objectives

- Encourage the preservation of the special character homes, apartments and streetscapes of Mission;
- Support apartment redevelopment that is sensitive to the existing community character and the older architecture;
- Facilitate the provision of affordable housing;
- Provide the opportunity for a broad mix of dwelling types.

9.2 Implementation

- The design of new buildings should complement adjacent development in terms of massing, scale, proportion and façade articulation.

4. The proposed application does not support the goals of City of Calgary policy documents

We consider our neighbourhood to be the one of the best models in the city of a rich, vibrant, inner city mixed-use culture. The community association has contributed to, and participated in, a number of progressive planning policies, including densification in an established community through our designated areas of mid- and high-density zoning, application of mixed

residential/commercial use on our High Streets, and the initiation of a concept plan for high density development on the 20-hectare Holy Cross sight.

We have contributed to the development of many of the City's policy documents and we believe in adhering to their rules and guidelines.

The Municipal Development Plan

The MDP states in section 2.3.2 *Respecting and Enhancing Neighbourhood Character*:

Objective: Respect and enhance neighbourhood character and vitality. The "sense of place" inherent in Calgary's neighbourhoods is a function of their history, built form, landscape, visual qualities and people. Together, the interaction of these factors defines the distinctive identity and local character of a neighbourhood.

The MDP also states the objective to "ensure infill development complements the established character of the area and does not create dramatic contrasts in the physical development pattern."

The Guidebook for Great Communities

The Guidebook features the following policy for Scale Transitions:

When adjacent parcels have different scale modifiers, special transition considerations should apply to support and foster the creation of well-designed buildings that respect their neighbourhood context. There are many architectural tools that can be used to support a sensitive transition between different building scales. Transition should consider the vision for the community, interface, scale, intensity, heritage and sense of place.

- a. New development should transition building height, scale and mass between higher and lower scale development in accordance with the identified scales in the local area plan.
- b. To transition building height, scale and mass, combinations of the following strategies may be used:
 - i. building step-backs and stepping down heights within individual buildings;
 - ii. angular planes to step building height between higher and lower building scales;
 - iii. reducing the street wall height to transition the visible mass of a taller building to match the cornice line for a shorter building;
 - iv. decrease scales incrementally through a block;
 - v. setbacks and landscaping to buffer higher intensity development from lower-intensity development.

5. The proposed application does not represent a sound approach to community building

Spot upzoning of this sort is a highly counterproductive practice that unnecessarily creates adversarial situations and winner/loser outcomes. It shatters a citizen's faith that rules apply to all and infers that a developer has greater influence with the City than the very residents whose lives and community will be most impacted.

With this sort of ad hoc height relaxation, the City – rather than providing a stable planning framework – introduces a level of unpredictability which is confusing to community residents, contradictory to good city planning, and could set a damaging precedent, moving us even further away from a planned approach to sensible densification.

Submitted by: Zaakir Karim

Planning & Development Director | Cliff Bungalow-Mission Community Association

cbmca.development@gmail.com



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First name (required)	Derritt
Last name (required)	Mason
What do you want to do? (required)	Request to speak, Submit a comment
Public hearing item (required - max 75 characters)	Ward 11 Land Use Amendment, LOC2020-0048
Date of meeting	May 31, 2021

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

I am the Board President of the property immediately adjacent to the proposed development (314 25 Ave SW), and on behalf of the board, I would like to express my strong opposition to this policy and land use amendment. Approving these amendments would have an undeniably negative impact on our building, street, and neighbourhood. I would like to echo the comments that have already been clearly articulated by the Cliff Bungalow-Mission Community Association (CBMCA) in their letter of opposition. Specifically, and most importantly for our building, the proposed development "is not sensitive to its context and will not complement our adjacent properties." We are a low-rise, four-storey building that will live in the shadow of this inappropriately sized and incompatible development. As the CBMCA document highlights, the XOLO building to the north of the proposed development "perfectly conforms in spirit and build form to the present DC and would be very negatively affected." Moreover, to the west of our building on 25 Ave, Wexford Developments is in the process of building a rental complex (Elva) that is in perfect alignment with the Mission Area Redevelopment Plan, demonstrating that it is completely reasonable and financially feasible to build a structure that adheres to community goals and aesthetics. A development that so flagrantly defies the norms of its surroundings will do substantial harm to our community and set a terrible precedent for future developments. As the CBMCA letter states, we cannot allow the will of developers to trump the needs and desires of community members, those of us who care deeply about our neighbourhood. This proposal has received nothing but opposition from community members (the documents submitted to council

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Unrestricted

May 18, 2021

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specify that "50 residents submitted letters of objection," and mention zero letters of support), and is clearly and adamantly opposed by the Community Association. It would be a tremendous, harmful error to approve this proposal and I sincerely hope that council rejects it on these very solid grounds. Thank you for your time and consideration -- we are grateful.