

Community Association Response

2024 October 17

CLIFF BUNGALOW-MISSION COMMUNITY ASSOCIATION

Planning and Development Committee

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October 17, 2024

City of Calgary
Planning and Development
Third floor, Municipal Building
800 Macleod Trail SE
Calgary, Alberta

Re: **LOC2024-0041**, 537 20 Avenue SW

Decision: **Letter of Comment**¹

The Cliff Bungalow-Mission Community Association (“CBMCA”) has reviewed the land use change application “LOC2024-0041”. Based on its review, the CBMCA offers five discussion points, expanded upon on the pages that follow.

1. **The Applicant engaged in good faith.** The CBMCA believes the Applicant worked with community stakeholders in good-faith.
2. **The proposed land-use change fits within the CBMCA’s vision for Cliff Bungalow.** The CBMCA believes that outside of the Historical Conservation Policy Area of Cliff Bungalow, sensitive densification within the residential core of the neighborhood should equate to an eclectic mix of new and restored single-family homes, townhouses and 3-5 storey multi-family buildings.

¹ The CBMCA issues four types of decision: 1 Opposed, 2 Concerned, 3 No Objection/Comment & 4 Support.

1. **Letters of Opposition** indicate that the Application has serious discrepancies with respect to our ARP’s and/or Bylaw 1P2007. When a letter of opposition is issued we will consider filing an appeal with SDAB if remedial actions are not forthcoming in an amended Application.
2. **Letters of Concern** indicate that either we have insufficient information on which to base a decision or that that the Application has some discrepancies with respect to our ARP’s and/or Bylaw 1P2007. When a letter of concern is issued we may consider filing an appeal with SDAB if further clarifications and/or amended plans are not provided.
3. **Letters of No Objection/Comment** are provided for reference. They do not indicate approval or opposition. We would not normally consider filing an appeal with SDAB after providing a letter of No Objection/Comment, unless affected residents requested our support or the DP is issued with relaxations to the relevant bylaws.
4. **Letters of Support** indicate that we consider the Application to be in general accordance with our ARP’s. To obtain a letter of support the applicant is strongly encouraged to work the CBMCA and affected residents through a charrette or similar community engagement design-based workshop. We would not consider filing an appeal with SDAB after providing a letter of support

The subject parcel (537 20 Avenue SW) sits outside of historical conservation policy area of Cliff Bungalow. Furthermore, the LOC Application (LOC2024-0041) would allow for a contextually appropriate, 3-5 storey multifamily development. As such, this LOC Application is reasonable.

3. **The current iteration of architectural design is substantially improved relative to the original renderings.** The Applicant has made a number of iterative design improvements to better adhere the design of the proposed development to the architectural guidelines of the historical neighborhood of Cliff Bungalow. Of note, the CBMCA is confident that the Applicant intends to develop their currently proposed development (i.e. the risk of a bait-and-switch or land-flip is low).
4. **The loss of the multiple heritage homes and mature trees required to make way for a new development on this parcel will be a significant loss for the community. More durable incentives for heritage designations would be helpful in allowing Cliff Bungalow to retain its heritage assets.** This proposed development would result in the loss of four character buildings within the heritage community of Cliff Bungalow-Mission. The CBMCA believes insufficient municipal incentives are exacerbating the loss of heritage homes within the community of Cliff Bungalow. The City of Calgary should consider enhancing residential heritage incentives at the municipal level, including through the permanent elimination of the municipal mil rate for all designated heritage homes within Calgary.

The presence of mature trees is also an important character feature for the community of Cliff Bungalow-Mission. The proposed development would result in the loss of mature trees within the community. **The CBMCA would appreciate if the Applicant is able to maximize the number of trees saved.**

5. **Improving equity and efficiency as the redevelopment of Calgary's established areas accelerates.** (1) The City of Calgary could develop further policies to nudge developers to develop fallow parcels prior to redeveloping parcels that already provide housing. This strategy would enhance the aggregate of market provided affordable housing, there by keeping rents and home prices more affordable. (2) Separately, the City of Calgary could advocate to the Government of Alberta for better tenant protections around displacement due to demolition and/or substantial renovations.

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1. Quality of engagement and acknowledgement of Applicant

The Cliff Bungalow-Mission Community Association (“CBMCA”) believes the Applicant worked with community stakeholders in good-faith. The feedback, questions, concerns and comments stemming from multiple conversations with the CBMCA and community residents resulted in thoughtful modifications of the massing model, LOC Application and DP Application. Where the Applicant decided against accommodations, reasonable explanations were provided.

The CBMCA acknowledges the Applicant’s contribution to housing supply during a housing crisis

While federal policies have largely contributed to severe housing crisis within municipalities across the country, finger pointing does nothing to address the current situation. While reducing go-forward immigration rates back to responsible levels would help solve the demand side of the equation, resolving the supply side requires supporting economic actors that are supplying new housing.

The dynamics of the housing industry are pretty straight forward. Developers build new housing stock. Upon delivery, this new housing stock increases housing supply, which helps to reduce market rents at the top end of rental market. As affluent people gravitate to these new suites, they relinquish occupancy of their prior suites, which are typically more affordable. These more affordable suites can then be used by others, which in turn relinquish their more affordable suites. And this creates a domino effect that allows for the diffusion of increased affordability throughout the housing market. Equally as important, as housing stock ages it becomes more affordable housing.

The bottom line is that ensuring an adequate flow of new housing is necessary to keep housing affordable for everyone and over time. It is also the only way the free market can deliver affordable housing units; it just works on a 30–40-year time-lag. Within this context, the CBMCA believes it is important to acknowledge that the Applicant is positively contributing to housing supply and to the functioning of the housing market.

2. The proposed land-use change fits within the CBMCA’s vision for Cliff Bungalow

In broad-strokes, the neighborhood of Cliff Bungalow is composed of three residential areas:

- **A small historical preservation area.** A historical preservation area of roughly five square-blocks between 5th Street SW and Cliff Street SW. This historical preservation area has strict architectural guidelines, strict limits on height and setbacks, and strict limits on building forms. **This LOC Application would have been wholly inappropriate if it had been proposed within Cliff Bungalows historical preservation area.**
- **Higher density periphery.** The periphery of Cliff Bungalow, located north of 18 Avenue SW and south of 25 Avenue SW, where higher density forms are often appropriate.

- **Eclectic residential core.** The residential core of Cliff Bungalow, where sensitive densification equates to an eclectic mix of new and restored single-family homes, townhouses and 3-5 storey multi-family buildings tied together by architectural guidelines that pay homage to Cliff Bungalow’s historical roots.



Figure 1. Land Use Policy Areas within Cliff Bungalow

This parcel is located in the eclectic residential core of Cliff Bungalow that is continuously evolving into a changing mix of heritage homes, new infills, townhouses, and 3-5 storey multi-family buildings. The current mish-mash of zoning and building typologies within this area encapsulates the CBMCA’s visions for the area (i.e. the mish-mash of typologies is a feature rather than a bug). As such, the existing character homes that sit on the subject parcels adhere to the CBMCA’s vision for Cliff Bungalow, but so too would the proposed the proposed development.

This LOC Application is loosely based on the M-C2 district, which is contextually appropriate for Cliff Bungalow. Cliff Bungalow has many parcels that are zoned either M-CG or M-C2 between 4th Street SW and 5A Street SW. The most recently completed M-C2 project completed in the neighborhood are listed below:

- 2320 5 Street SW – Apartment of 35 units, completed in 2022
- 1730 5A Street SW – Apartment of 33 units, completed in 2010
- 509 21 Avenue SW – Apartment of 23 units, Completed in 2006

The high-level attributes of the project proposed by the Applicant (FAR of 3.3 and a height of mostly 15.5m) are similar to the attributes of the M-C2 district (maximum FAR of 2.5x and maximum height of 16m) that is ubiquitous within Cliff Bungalow.

The CBMCAs understanding is that the Applicant is largely proposing a five-storey building (15.5m), with a sub-section of a sixth-storey (bringing the development to 18.6m in height) to allow for to a roof-top garden amenity. There is also a small mechanical screen on top of the rooftop amenity and some flexibility to the proposed height (taking the height in the LOC Application to 21m). However, the CBMCA believes the massing of the building will be fairly similar to the maximum height allowance of the M-C2 district (16.0m) as it relates to shadowing and public realm considerations.

Additionally, the CBMCA understands the proposed building would have an FAR of 3.3x, which is a considerable relaxation relative to the M-C2 district (FAR of 2.5x) that is already ubiquitous within the neighborhood; however, the proposed setbacks around the proposed development are contextually appropriate (as is the step-back on the east side of the proposed development). As such, the relaxation in FAR seems reasonable, providing incremental density without incremental adverse impacts to neighborhood character.

3. The current design iteration of the proposed development adheres to the architectural guidelines of the Cliff Bungalow ARP

As detailed earlier within this note, outside of the Historical Conservation and Infill Area of Cliff Bungalow, sensitive densification within the residential core of Cliff Bungalow is largely expected to equate to an eclectic mix of new and restored single-family homes, townhouses and 3-5 storey multi-family buildings.

In order to preserve the character of the neighborhood, all new residential structures – whether single family homes, townhomes or multi-family buildings - are expected to cohesively blend into the neighborhood from an architectural perspective. Neighborhood character features include guardrails on height and contextual setbacks that apply to both new buildings and existing buildings undergoing adaptive reuse.

As outlined within the Cliff Bungalow ARP, new homes and townhomes are required to incorporate architectural character features, which can include a mix of pitched roofs, porches, gables, dormers and other architectural details. With regards to materiality, finishing materials that align with community character include narrow lap siding, standard brick and cedar shakes. Many

of these architectural guidelines can be extended to apartment style developments.² A conceptual rendering of such a development is depicted below:

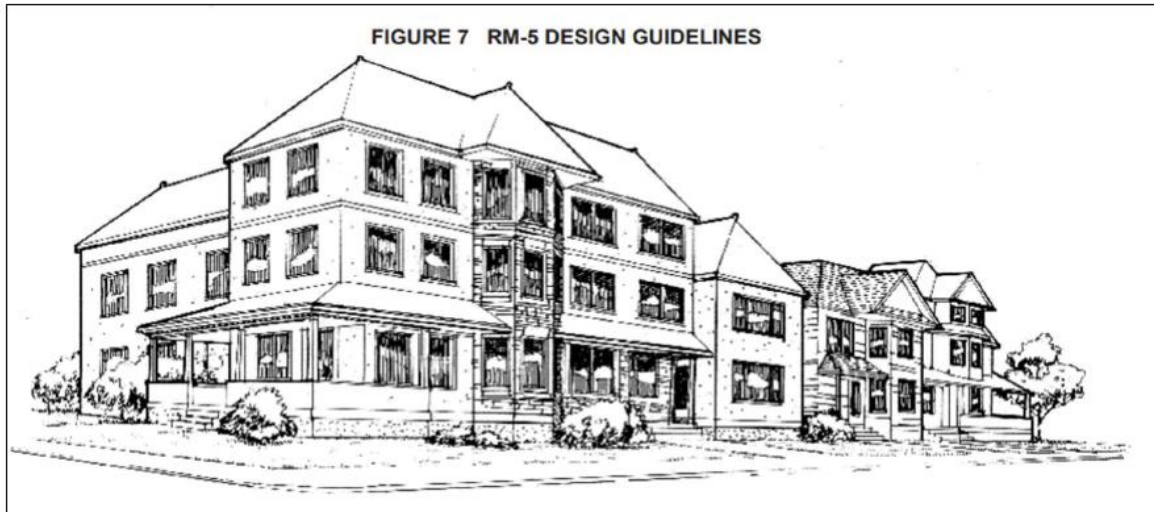


Figure 2. Example of an apartment style building adhering the architectural guidelines outlined in Cliff Bungalow ARP

That said, developers in Cliff Bungalow often decide to design more contemporary, block style apartments style buildings. The CBMCA is comfortable with such designs as they can be cohesive with the heritage retail and multifamily buildings of Cliff Bungalow-Mission, as depicted below.



Figure 3A. Example of historical buildings in Mission featuring block-style massing

² The Cliff Bungalow ARP (3.1.4.4) notes for RM-5 developments, “New medium density developments should be designed in a manner which is consistent and compatible with the character and scale of the adjoining RM-2 and RM-3 areas. A well-articulated building facade with architectural details, sloped roofs, at grade entries, lane access parking and finishing materials which complement the surrounding low density residential character of the area is encouraged.”



Figure 3B. Example of historical buildings in Mission featuring block-style massing

The CBMCA believes the Applicant's current proposal (depicted below) meets the criteria for an appropriate block design for Cliff Bungalow. The proposed development features a height of 3-5 storey, contextual setbacks, at grade entries, lane access parking, and includes healthy amounts of brick and narrow lap siding on its exterior façade.



Figure 4: Applicant's most current rendering of Davis Block

	Architectural design guidelines outlined in Cliff Bungalow ARP	Applicant's Proposal	Adherence to ARP
Height	2-5 Storeys	5-Storeys	Good
Setbacks	Contextual	Contextual	Good
Step-backs	Reasonable	Reasonable	Good
At grade entries	Yes	Yes	Good
Lane access parking	Yes	Yes	Good
Materiality	Brick, narrow lap-siding, cedar shakes	Brick paneling, narrow lap siding, metal paneling	Okay

Figure 5: Applicant’s adherence to design guardrails outlined within Cliff Bungalow ARP

Committee members of the CBMCA did have some mixed opinions on the quality of the design. Some members expressed concern around the window alignment, preferring windows to be vertically aligned to align with community character. Others noted concerns with the selection of brick panels (instead of brick or brick vaneer) and of metal paneling (not a historically sensitive material). In contrast, others felt the current design iteration would fit into the community reasonably well.³

For comparison, examples of contemporary apartment-style projects that have cohesively blended into the community of Cliff Bungalow-Mission are provided below. The Applicant’s current design is comparable in quality to these other projects.



Figure 6: Truman’s 1901 College Street Project, located in Cliff Bungalow-Mission at 1901 5th Street SW

³ “New development should be designed to be unobtrusive and to blend with the scale and form of existing and adjacent homes. The redevelopment of existing dwellings as well as new development shall respect the historic style of homes in Cliff Bungalow and incorporate elements of the original building styles common to the community.” (Cliff Bungalow ARP 3.1.4.3).



Figure 7: Wexford Development's Elva Project, located in Cliff Bungalow-Mission at 320 25 Avenue SW



Figure 8: Unittii Corp's Mission Flats, located in Cliff Bungalow-Mission at 320 19 Avenue SW



Figure 9: CDH Development's Tela Condominiums, located in Cliff Bungalow-Mission at 317 22 Avenue SW



Figure 10. Harold Sicherman's District Condos, located in Cliff Bungalow-Mission at 305 18 Avenue SW



Figure 11: Bucci's Tribeca Condos, located in Cliff Bungalow-Mission at 323 20 Avenue SW

4. Discussion around the continued loss of heritage buildings in Cliff Bungalow

Insufficient municipal incentives exacerbate the loss of heritage homes

The loss of heritage homes throughout the community of Cliff Bungalow-Mission is a loss for character, identity and sense of place, both within the community and for Calgary more broadly. The CBMCA realizes that outside of the historical conservation area in Cliff Bungalow, the loss of some older homes between 4th Street SW and 5th Street SW will be inevitable as sensitive densification occurs. However, the evolutionary balance in Cliff Bungalow seems to have become increasingly tilted against the preservation of character homes over recent years.

Specifically, over the decade, 16 character homes have been removed to make way for townhomes and apartment style developments, as depicted in Appendix 1. Over those same ten years, only two structures in Cliff Bungalow – whether residential, institutional or commercial - have been

historically designated. This is of significant concern to the residents of Cliff Bungalow-Mission, with many feeling that irreplaceable aspects of the historic community are under threat.

The CBMCA believes the City of Calgary could help to restore balance to this equation by increasing the publicly available incentives for private citizens to designate and rehabilitate their heritage homes and is advocating for **permanent property tax abatement for historically designated homes.**

The CBMCA believes the City of Calgary should move forward with property tax abatement for historically designated homes, but go even further than is currently being proposed. Specifically, the CBMCA advocates for the permanent removal of the municipal mil rate for all municipally designated homes. Such an incentive would be enduring and permanent, much like the decision to historically designate a home. Based on an average detached home value of \$640,000 within Calgary, eliminating the municipal mil rate for residential heritage homes would increase the value of heritage designation by an average of ~\$65,000, offsetting the loss of optionality a home owner incurs by choosing to pursue heritage designation on their home. Such a policy would also have a negligible impact on tax rates. If the CBMCA's math is correct, each incrementally designated heritage home would increase the annual property tax on a residential property in Calgary by roughly \$0.005 (half-a-cent), a truly negligible amount.

5. Improving equity and efficiency as Calgary's established areas redevelop

The City of Calgary should create additional policies to incentivize the buildout of privately held, fallow, inner-city land

The path function for the redevelopment of Calgary's inner city is important and could be more thoughtfully nudged in an equitable and efficient direction by the municipal government. In an idealized path function, developers would choose to redevelop vacant inner city lots into new multi-family housing PRIOR to redeveloping market-provided affordable housing into new multi-family housing.

This idealized path function would allow affordable suites to better coexist with new housing developments by prolonging the stock of affordable market-supplied housing. This in turn would positively impact aggregate housing supply, improve housing affordability, increase the rate of densification within Calgary, promote diversity of housing types, help combat climate change, reduce landfill waste and reduce property taxes per household. It also reduces the need for all levels of government to supply non-market, affordable housing, which frees up tax revenue for better uses (such as tax cuts or other social objectives).

The select use of policy levers (such as reduced developer surcharges and punitively high mil-rates on fallow land) could be used as carrots and sticks to nudge developers to build on fallow inner-city land first. Underutilized land in Mission/Beltline east of Centre Street S, in Sunalta along 10 Avenue SW and in Beltline to the north of 12 Ave SW seem like obvious areas where such policies could be explored.

City of Calgary might consider advocating to the Government of Alberta for stronger tenant protections around displacement

The CBMCA believes its mandate as a community association includes advocating for the reasonable treatment of the community residents that lose their homes when existing rental suites are demolished to make way for new development. Based on the Residential Tenancies Act of Alberta, these residents of Cliff Bungalow-Mission will be legally responsible to bear the full cost of this displacement even though the decision to redevelop was not theirs to make.

These displacement costs include the cost of finding alternative living arguments, the cost of packing, the cost of moving, and having sufficient liquidity to come up with a new security deposit for their new rental premises (while still renting at their current residence). The CBMCA would estimate impact at \$1,000-\$2,000 per displaced tenancy. This negative externality imposed on these residents is compounded by the fact that most of these residents are renting affordable suites, which implies the burden of displacement might be substantial for some of these Calgarians.

Much of the argument against rent control in Alberta stem from the idea that allowing free markets to function efficiently will minimize aggregated long-term rents. As such, while rent control policies are controversial, stronger tenant protections around minimizing the negative externalities of displacement should be easily supportable. The City of Calgary could advocate to the Government of Alberta for better tenant protections around displacement due to demolition and/or substantial renovations.

Appendix 1 – Depiction of demolished character homes in Cliff Bungalow over past decade



Figure 12. Four character homes are at risk of loss with respect to the Davis Block development in 2024



Figure 13. Four character homes were demolished to develop a townhouse at 530 23 Avenue SW in 2015



Figure 14. Three character homes were demolished to develop an apartment at 527 24 Avenue SW in 2020



Figure 15. Three character homes were demolished to develop an apartment at 1901 5 Street SW in 2023



Figure 16. Three character homes were demolished to develop a townhouse at 1920 5A Street SW in 2015



Figure 17. One character homes was demolished to develop a townhouse at 2298 5 Street SW in 2021