

# CLIFF BUNGALOW-MISSION COMMUNITY ASSOCIATION

## Planning and Development Committee

462, 1811 4 Street SW, Calgary Alberta, T2S 1W2

Community hall and office, 2201 Cliff Street SW

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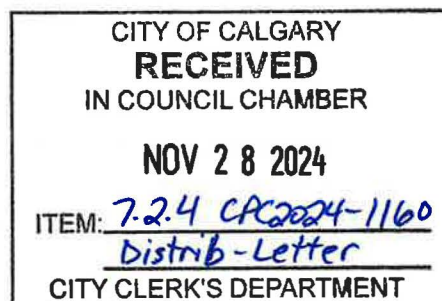


November 28, 2024

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

Re: **LOC2024-0220**, 608 22 Avenue SW

Decision: **Letter of Opposition**<sup>1</sup>



The Cliff Bungalow-Mission Community Association (“CBMCA”) has reviewed the land use change application “LOC2024-0220”. Based on its review, the CBMCA offers four discussion points in outlining its Letter of Opposition.

1. **Quality of engagement has been poor.** The Applicant did not meet the bar for meaningful engagement with any of the CBMCA, immediate neighbors, or the residents of Cliff Bungalow.
2. **The proposed change in land-use to M-C2 does not fit within the CBMCA’s vision for Cliff Bungalow.** There are three core land use features of Cliff Bungalow’s *Heritage Conservation Policy Area*: contextual setbacks, height limitations of 11m-12m, and adherence to architectural guidelines that respect the historical style of homes in Cliff Bungalow. Every development within the *Heritage Conservation Policy Area* of Cliff Bungalow is required to meet these criteria in full. The subject parcel is located within this

<sup>1</sup> 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 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

*Heritage Conservation Policy Area* and there is no justifiable policy rational to make an exception for subject parcel around any of these three criteria.

An LOC Application from M-CGd72 to M-C2 would allow for a development of up to 16.0m, out of step with the *Heritage Conservation Policy Area's* guardrail on height specifying a maximum of 12m (equating to 3-4 storeys). As such, the CBMCA must oppose this LOC Application.

3. **Approving this Application would create a negative precedent that would irrevocably damage the integrity of Cliff Bungalow's Heritage Conservation Policy Area.** As soon as one parcel owner is given permission to deviate from existing height maximum of 11m-12m, it creates an open season for other developers and land assemblers to ask for the same permission. On a go-forward basis, anyone who puts together a similar assembly within Cliff Bungalow's *Heritage Conservation Policy Area* could then successfully argue for a similar land use change from M-CGd72 to M-C2 (or similar).

Given the land-lift involved in upzoning from M-CGd72 to M-C2, developers and land assemblers will have a reduced incentive to keep the heritage homes intact and will increasingly be able to outbid homeowners who would otherwise lovingly restore and maintain their heritage home. Over time, as heritage homes are assembled and then demolished to make way for new developments, the historical value of the *Heritage Conservation Policy Area* would be fully eroded and the community of Cliff Bungalow-Mission would lose its historic soul.

At the present time, all homes along 22 Avenue SW (on both sides of the street) adhere to the existing height maximums of 11m-12m and contextual setbacks of the Heritage Conservation Area. The existing guardrails are incredibly effective in conserving this valuable historical district within Cliff Bungalow. Allowing relaxations on height would be reckless and short-sighted; it would effectively undermine decades of work by residents in Cliff Bungalow-Mission to conserve a special piece of Calgary's history.

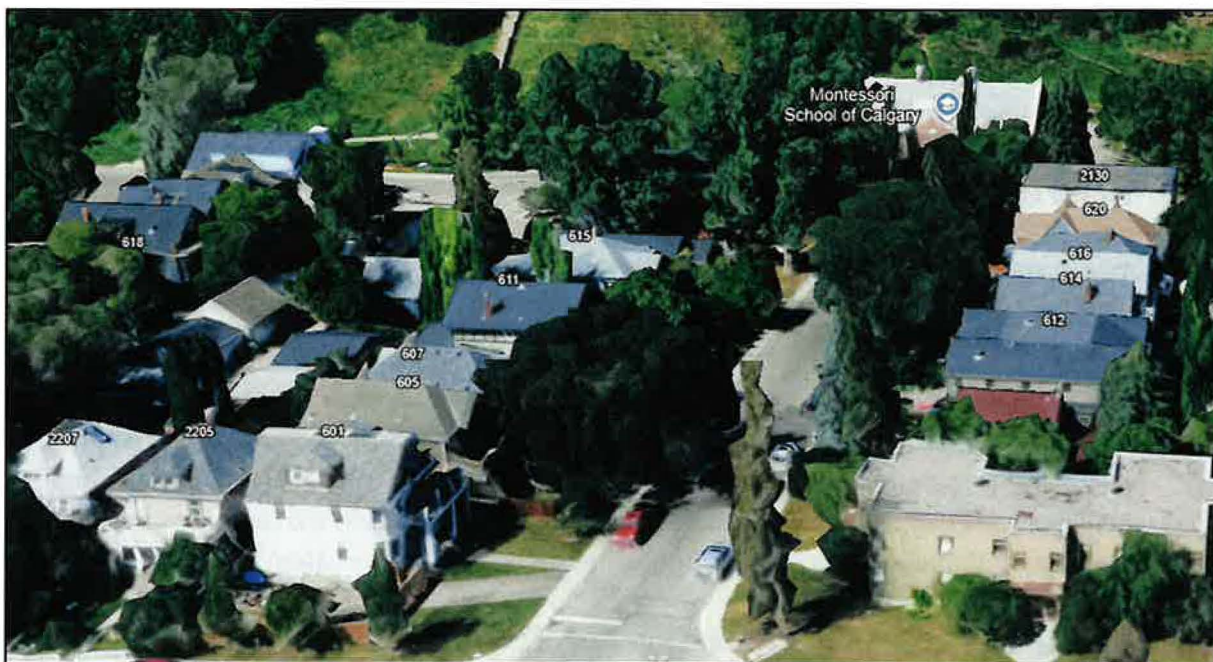


Figure 1. The streetscape of 22 Avenue SW within the Historic Conservation Area

The land use change would also create a perverse incentive to demolish the existing heritage asset. The parcel containing the heritage home is an existing heritage asset as identified under the windshield survey conducted by the City of Calgary. Redesignating it to M-C2, provides a perverse incentive to redevelop the parcel rather than rehabilitate the home.

Heritage Calgary needs to be consulted on this point of concern and render an opinion of whether this would be good policy from a heritage perspective.

4. **The CBMCA is open to a multifamily building.** However, such a development needs to adhere to the guardrails of the *Heritage Conservation Policy Area* as it relates to contextual setbacks, maximum height of 12m and architectural guidelines. Such a development would require a LOC Application for a direct control district rather than through an LOC Application to M-C2.

**Zaakir Karim**

Director, Planning and Development Committee  
Cliff Bungalow-Mission Community Association  
[cbmca.development@gmail.com](mailto:cbmca.development@gmail.com)



## 1. Quality of engagement has been poor

The Cliff Bungalow-Mission Community Association (“CBMCA”) does not believe the Applicant has meaningfully engaged with the community.

To the CBMCA’s knowledge, the Applicant’s engagement with immediate neighbors consisted only of putting copies of the Applicant Submission into neighbors’ mailboxes (See Appendix 1). The copies of this Applicant Submission had no contact information for residents to get in touch with the Applicant for additional information.

The Applicant’s engagement with the CBMCA consisted of a single pre-Application meeting where they stated they wanted to build an apartment building. Because the Applicant had no materials prepared, there was little discussion beyond the CBMCA providing site and neighborhood context to the Applicant and explaining why a land use redesignation to M-C2 would not align with the policies of Cliff Bungalow’s Heritage Conservation District.

The CBMCA is unable to discern the design/strategy/intent for the parcels beyond rezoning it to M-C2 for the purpose of “allowing for a purpose-built rental apartment building on the consolidated site, accommodating one level of underground parking,” as per their Applicant Submission.

## 2. The proposed land-use change does not fit CBMCA’s vision for Cliff Bungalow

Cliff Bungalow is composed of three distinct residential areas as per the map below:

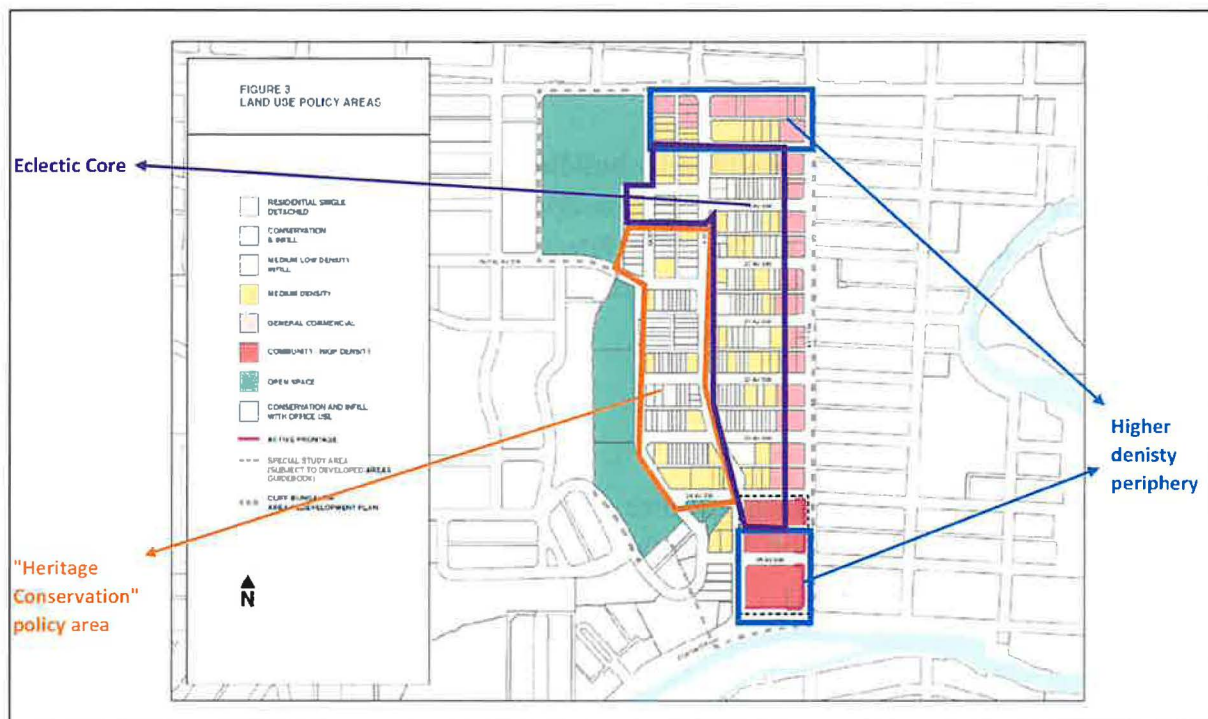


Figure 2. The three residential policy areas of Cliff Bungalow

- **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.
- **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.
- **Heritage Conservation Policy Area.** A historical preservation area of roughly four square-blocks between 5<sup>th</sup> Street SW and Cliff Street SW. This historical preservation area has strict architectural guidelines, strict limits on height (12m) and setbacks (contextual), and strict limits on building forms (new development shall respect the historical style of homes in Cliff Bungalow and incorporate elements of the original building styles common to the community). *The subject parcel is located within this Heritage Conservation Policy Area and as such, the CBMCA would oppose any application that would compromise the integrity of this area by requesting relaxations around height, setback or building form.*

#### **The Heritage Conservation Policy Area of Cliff Bungalow**

The *Heritage Conservation Policy Area* consists primarily of low-density residential structures, and allows for the development of single-detached, semi-detached and townhouse dwellings (both row-townhouses and courtyard style townhouses). For new developments, the *Heritage Conservation Policy Area* sets strict limits on height (12m), setbacks (contextual) and architectural forms (respecting the historical style of homes in Cliff Bungalow).

As shown in the map below, this policy area remains contextually appropriate in part because the *Heritage Conservation Policy Area* of Cliff Bungalow is contiguously bounded by the low-density residential areas of Elbow Park (and Rideau and Roxboro) to the South and Upper Mount Royal to the West. The CBMCA believes these four blocks of primarily low-density, residential dwellings should thus be viewed as an extension of these low-density neighborhoods. As such, *Heritage Conservation Policy Area* should be treated in-line with City Administration's vision for other low-density residential areas within the inner-city, primarily allowing for single-family homes, semi-detached dwellings and townhouses. From this perspective, the existing zoning of the *Heritage Conservation Policy Area* remains appropriate.





Figure 3. The geographical position of the Heritage Conservation Policy Area of Cliff Bungalow relative to low density neighborhoods of Elbow Park and Upper Mount Royal. The subject parcel is shown in yellow.

The *Heritage Conservation Policy Area* largely consists of heritage homes and heritage apartment buildings, largely built between 1910-1920. Given that the *Heritage Conservation Policy Area* has been in existence for at least 35-years, it should be no surprise that it has attracted many civic-minded homeowners and multi-family investors to the area that have used private capital to purchase, restore and steward their heritage homes and heritage apartments, furthering the MDP objective of historical preservation. As a result, the large majority of the block-faces within Cliff Bungalow's *Heritage Conservation Policy Area* – including the block-face of the subject parcel – fully meet the eligibility criteria for inclusion into the City of Calgary's established "Heritage Area" framework.

Work occurring through both Local Area Plan working groups for West Elbow (the main working work and the heritage working group) fully recognize the value of this *Heritage Conservation Policy Area*. As such, there can be no doubt that the policies within the Cliff Bungalow ARP remain fully relevant with regards to conserving this unique heritage area. Existing policy guardrails with respect to height, setbacks and architecture should be upheld.

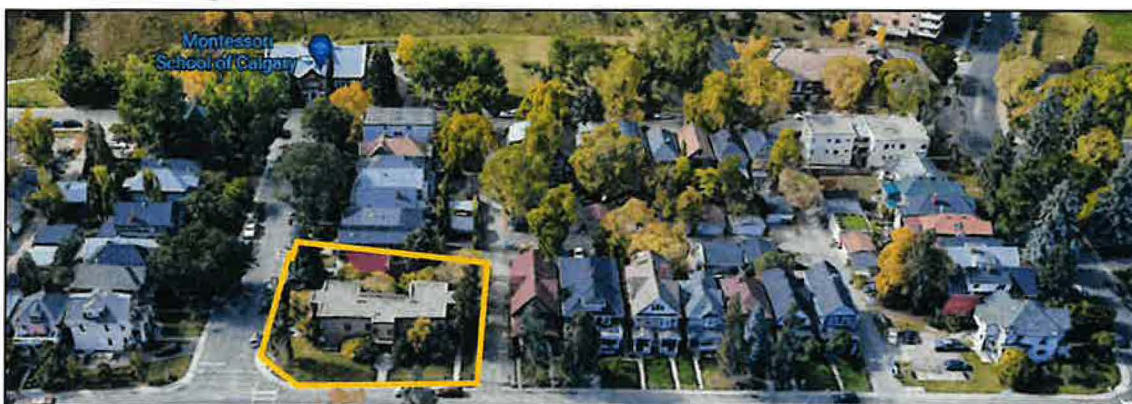


Figure 4. The west-facing aerial view of Cliff Bungalow's Heritage Conservation Policy Area illustrates its historical importance, including two municipally designated buildings, numerous heritage homes, and small-scale apartments of historical importance. Almost the entirety of the roughly four blocks of Cliff Bungalow's Heritage Conservation Policy Area fully meets the eligibility criteria for inclusion into the City of Calgary's established "Heritage Area" framework. The subject parcels are shown in yellow.

Very few such intact blocks of Edwardian era homes still exist within Calgary's established area. Thus, it's no surprise that City Administration is studying policy ideas to further strengthen this *Heritage Conservation Policy Area*. The CBMCA believes that over time, these blocks could become one of the only remaining living examples of what Calgary looked like in the early-1900s. The idea that the guardrails around setbacks, height and building form of the *Heritage Conservation Policy Area* should be sacrificed for further densification as Calgary grows, in turn implies that heritage preservation matters less as Calgary's population grows, when the opposite is true. The more Calgary ages, the more important heritage conservation of structures and areas becomes. And because of on-going suburban development, the proportion of heritage conservation areas within Calgary falls over time, even without considering that remaining unprotected heritage structures outside of conservation areas are demolished over time to make way for redevelopment.

Ensuring a continuous flow of new housing as Calgary grows is an important objective, as is densification; however, this does not need to come at the expense of heritage conservation areas.

### 3. Opposition to the LOC Application to M-C2

The CBMCA's opposition with regards to this LOC Application to change the land use district to M-C2 (from M-CGd72) is that the M-C2 land use district would not adhere to height or setback provisions of the *Heritage Conservation Policy Area*.

The height maximum of Cliff Bungalow's *Heritage Conservation Policy Area* under M-CGd72 is 12.0m. Under M-C2, the height maximum is increased to 16m, which is out of step with the *Heritage Conservation Policy Area*'s guardrails on height.

Also of concern, the parcel containing the heritage home is an existing heritage asset as identified under the windshield survey conducted by the City of Calgary. Redesignating it to M-C2, provides a perverse incentive to knock down the home and redevelop it rather than rehabilitate it.

**4. The CBMCA is open to a higher density development on the subject parcels.**

The CBMCA does not have concerns with increasing the allowable density from 72 units per hectare under M-CGd72 in order to allow for an apartment style development. That said, any such development needs to fit within Cliff Bungalow's *Heritage Conservation Policy Area's* guardrails with regards to height, setback and architectural guidelines. This will require a DC Zoning Application that specifies a maximum of 12m height, contextual street setbacks and appropriate setbacks and stepbacks to surrounding neighbors.



## Appendix 1: Engagement by Applicant with regards to immediate residents

- Applicant Submission put into neighboring mailboxes
- No contact information provided with regard to how to obtain more information
- LOC Application number not detailed

**Applicant's Submission**

Company Name (if applicable):  
Riddell Kurczaba  
Applicant's Name:  
[REDACTED]  
Date:  
July 29, 2021

LOC Number (office use only):

Re: 608 22 Avenue SW - Land Use Amendment application

The property owners of 608 22 Avenue SW are seeking to rezone the property from M-CG72 to M-C2.

The proposed zoning is aligned with the zoning of the neighbouring property, 602 22 Avenue SW, at the corner of 22 Avenue SW and 5th Street SW, which has been owned by the same party for over 40 years.

The existing 6-unit residential complex is nearing its life span, and it is time to develop a new apartment building that will fit nicely into the surrounding context of the Cliff Bungalow Mission area.

The design process is in its very early stages and the intent is to allow for a purpose-built rental apartment building on the consolidated site, accommodating one level of underground parking.

We believe it will be an inviting new amenity to the Mission and Cliff Bungalow area.

Prior to the application we have initiated a Pro-Application Assessment under PE2024-00259.

We have met with the CBMCA Development Committee to review the intent of the application and have circulated letter to the immediate neighbours and the Councillor Courtney Walcott prior to filing the application.

Thank you,  
Peter Schulz

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