

Community Association Responses



Beltline Neighbourhoods Association
102 17 Ave SW
Calgary, AB T2S 3G2

June 10, 2025

Re: LOC2024-0257 (101 17 Avenue SW)

Dear Members of the Calgary Planning Commission,

The Beltline Neighbourhoods Association's Urban Development Committee (BUDc) is generally supportive of the proposed land use application for 101 17 Avenue SW and appreciates the opportunity to provide early feedback. We recognize the potential for this site to become a landmark project contributing positively to the area. However, we strongly emphasize the need for close collaboration at the Development Permit (DP) stage to ensure the proposal sensitively responds to its context—particularly Humpy Hollow Park, a critical public amenity. BUDc met with the applicant on June 4, 2025 and had a productive conversation about these concerns. The applicant has indicated a commitment to continue to work with us at the DP stage.

Humpy Hollow Park

Humpy Hollow Park is an important community asset, the result of a multi-year investment and grassroots redevelopment initiative initiated by the BNA. Given the significant shortfall in park space across the Beltline—well below the City's own standards—we hope the importance of sunlight access and shadow mitigation will be addressed in both the potential Direct Control district wording and in subsequent development permits.

The park includes several distinct program areas, each with varying sensitivities to shade. Even limited shadowing in key areas can negatively affect comfort, usability, and year-round programming potential. A number of considerations were reviewed and discussed:

- We note that the West Elbow Communities LAP requires that shadow impacts to adjacent parks be minimized.
- We appreciate that the proposed narrow tower form is a positive strategy to mitigate shadow impacts. However, based on the current shadow studies, the tower appears to cast shadows on both Humpy Hollow Park and the north sidewalk throughout the year. By contrast, lower forms may avoid these impacts during critical summer months.
- Consideration should be given to positioning the tower on the site and/or angling it in such a way that light access to the park is optimized.
- We understand that Administration has suggested an alternative 6-storey massing with a broader footprint. While such a form may reduce the duration of shadowing, it risks increasing the overall extent of shadow coverage, particularly over park and pedestrian realm.



BELTLINEYYC.CA



- Further solar analysis at the DP stage is necessary, as is enabling language in the DC. A road and site cross section illustrating how sun angles have been considered in the building massing would be an important inclusion. This could help define a more nuanced build-to envelope, supporting a hybrid massing strategy—for example, stepping or terracing the building mass to allow for increased height at the rear of the site, while preserving sunlight access to the public realm along 17 Avenue and Humpy Hollow Park.

Planning and Policy Considerations

- The current land use bylaw allows for a 3.0 FAR, whereas the application requests 7.5 FAR. We understand that the applicant had initially proposed to provide additional public amenity in exchange for increased density. While we understand there is no formal density bonus structure in place for Mission-Cliff Bungalow, we are disappointed that the City has not supported a mechanism similar to that used in the Beltline. This could have facilitated public realm improvements and delivered mutual benefits to the community and applicant. Provided that shadowing impacts to Humpy Hollow Park and the 17 Avenue public realm are sensitively addressed, the BNA does not have a concern with this additional density.
- The current land use district permits a maximum height of 46 m, which conflicts with the 26-storey maximum supported in the West Elbow Local Area Plan (LAP). BNA does not object to this additional height being included in the DC, provided shadowing and public realm impacts are appropriately addressed.
- While the LAP justifies additional height based on proximity to Victoria Park/Stampede LRT Station, BNA is concerned with this narrow interpretation of Transit-Oriented Development (TOD). We argue that the entire Greater Downtown, including adjacent communities like Mission, is already well-served by multimodal transit, including walking, cycling, and high-quality bus connections. Height and density should instead be guided by urban form, proximity to amenities, and quality of the pedestrian realm—not a radial TOD model biased to LRT. The framework in the policy at this location is not reflective of commuter behaviour in this part of the City, and we are perplexed as to how this made its way into the LAP.

Sincerely,

Tyson Bolduc
Director of Planning, BNA



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

www.cliffbungalowmission.com

cbmca.development@gmail.com



July 15, 2025

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

Re: **LOC2024-0257, 101 17 Avenue SW (Multiple Addresses)**

Decision: **Letter of Comment¹**

The Cliff Bungalow-Mission Community Association (“CBMCA”) has reviewed the land use change application “LOC2024-0257”. Based on its review, the CBMCA has authored a Letter of Comment. We provide five discussion points below.

1. **It is unclear whether the proposed DC district specifies maximum allowable heights and floor plates that would sufficiently “minimize shadow impacts” and “optimize daylight” of Humpy Hollow Park and the north side of 17 Avenue SW.** The CBMCA was unable to come to a consensus as to whether the shadowing impacts on Humpy Hollow Park (as outlined in the shadow study) were reasonable and how they should be traded-off against incremental density within a TOD area. As such, the CBMCA defers to City Administration as to whether the proposed DC sufficiently aligns with the policies outlined in the MDP and WELAP as it relates to shadowing and daylight.

¹ The CBMCA typically 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 the MDP, WELAP and/or Bylaw 1P2007. When a letter of opposition is issued for a DP-Application 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 the MDP, WELAP and Bylaw 1P2007. When a letter of concern is issued for a DP Application, 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 Application is issued with relaxations to the relevant bylaws.
4. **Letters of Support** indicate that we consider the Application to be in general accordance with the LAP, MDP and LUB. 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 for a DP Application with SDAB after providing a letter of support



Exhibit 1. The City of Calgary spent \$3,250,000 on the revitalization of Humpy Hollow Park, which was completed in late-2024. The proposed DC district seeks to reduce shadowing on the park and north side of 17 Avenue, but would not achieve these goals as currently proposed.

2. **Policy within the WELAP and MDP note competing interests with respect to the appropriate height and massing for this parcel.** This conflict stems from the fact that the parcel is small and located on the south side of a pedestrian oriented Mainstreet and across from a public park; typically, this requires minimizing shadowing impacts, implying that a 20-storey point tower would not be appropriate in this location. However, the subject parcel is also located within 600m of a major transit station (the Victorian LRT Station), which suggests additional height and massing may be appropriate.

While the WELAP Building Scale maps suggest an appropriate height for this parcel as “up to 26-storeys,” this does not entitle the Applicant to a 26-storey building. Instead, these maps need to be read in conjunction with the MDP and WELAP and considered given the parcel parameters. If the parcel size is too small for the proposed development, the negative externalities the proposed development on neighboring parcels and adjacent public space would be substantial.

The CBMCA’s Planning and Development Committee was unable to form a consensus as to whether the range of outcomes embedded within the proposed DC represented a reasonable trade-off between negatives externalities on public parks and pedestrian high streets VS increased density within a TOD area. The CBMCA thus defers to City Administration on this matter.

Applicable MDP Policies that suggest a tower on the subject parcel may be inappropriate for the subject parcel are noted below.

- I. **MDP 2.4.2 (f)(iv)** - Plans and designs for taller buildings should ensure that they are minimizing the shadow and wind impacts on adjacent residential areas, parks and open spaces.
- II. **MDP 2.4.2 (f)(iii)** - Plans and designs for taller buildings should ensure that they are integrated with adjacent areas by stepping down to lower-scale buildings and compliment neighbourhoods.
- III. **MDP 2.3.4. (j)** - Plan land uses adjacent to public parks that are supportive and enhance the vitality of both existing and new open spaces.
- IV. **MDP 2.2.1(a)(v)** - Direct a greater share of new growth to the Activity Centres and Main Streets in a manner that limits the impacts of shadowing on streets, parks and properties.
- V. **MDP Developed Area Guidebook 4.2.1(d)** - Design the massing and articulation of wide and tall buildings, including orientation of perimeter block and mid-rise buildings, to optimize sunlight access on adjacent properties, streets and public open spaces.
- VI. **MDP 2.3.4** - Protect the basic social and environmental functions of City parks and public open spaces.

Applicable WELAP Policies that suggest a tower on the subject parcel may be inappropriate for the subject parcel are noted below.

- I. **WELAP 2.3.5(b)** – Development in High Scale areas should be designed to optimize sunlight access to streets and open spaces.
 - II. **WELAP 2.4.2.1(i)(iv)** – Development adjacent to or facing parks, including interfaces separated by a lane or street should minimize shadow impacts.
 - III. **WELAP 2.4.2.1(i)(j)** – A shadow study may be required at the planning application stage for development adjacent to parks and open space to ensure minimal daytime spring and fall shadow impacts.
 - IV. **WELAP 2.4.2.2** – Development should be designed to optimize sunlight access to the public space, open spaces and amenity space.
 - V. **WELAP 2.5.1(c)** – Main Streets - Buildings should minimize shadow impacts onto the sidewalk and public spaces on the opposite side of the street, measured in spring and fall equinoxes. Measures to minimize shadow impacts may include reduced floor plates, tower separation, step backs, tower orientation, tower dimension and tower location.
3. **Concerns around setbacks and step-backs from the south property lines.** Best-practice urban design guidelines outline minimum tower separation between two residential buildings (generally outlined for buildings in excess of 10 storeys) of ~24.0m. Best practice urban design guidelines also suggest that tower separation should be symmetrical from both sides of the property line, implying a minimum tower separation of 12.0m from a property

line shared with another parcel. For smaller infill parcels where 12.0m of tower separation from the property line shared with another parcel are not realistically achievable, smaller setbacks can be contemplated; however, the CBCMA was not able to reach a consensus as to whether 6.0m step-backs from the south property line would be appropriate. Both the subject parcel and the parcel to the south are noted as “up to 26 storeys” in the WELAP, with both parcels having similar parcel dimensions.

4. **There is an ambiguous policy justification to allow this proposed Direct Control (“DC”) district for the subject parcel.** The Land Use Bylaw (“LUB”) outlines two considerations when considering whether a DC land-use district is appropriate. First, under Section 20(1), the DC district “**must** only be used for the purpose of providing for developments that...require specific regulation unavailable in other land use districts.” Second, under Section 20(2), DC districts “**must not** be used in substitution of any other land use district in the LUB that could achieve the same result, either with or without relaxations of this Bylaw.”

LUB 20(4) notes that the General Manager must review each application for a Direct Control District and advise Council as to whether or not the same result could be achieved through the use of a land use district in this Bylaw. As such the CBMCA defers to City Administration on this issue.



Exhibit 2. Conceptual rendering of the Applicant's proposed massing model. The constraints imposed by the proposed DC district are considerably looser than what the Applicant has proposed.

5. **City Council's approval of a Direct Control (“DC”) district decreases the latitude and discretion of the Development Authority through the DP Application process.** Through DC districts, Council is delegating certain decision-making to the Development Authority with directions. Council's directions are crucial because they circumscribe the statutory powers of the Development Authority. Given this special treatment, it is imperative for

Council to be fully confident in the instructions embedded within Direct Control districts.

If the DC district constraints are too loose, a DP Application that complies with the DC district might still inflict severe negative externalities on neighboring properties, eviscerate the value of the Calgary's own public assets (Humpy Hollow Park) and permanently impair the quality of the public realm along this stretch of 17 Avenue SW.

As such, in order to vote in favor of a DC Application, City Council needs to be highly confident in the vision and range of outcomes that could result from the DC district, both from a policy perspective and technical perspective. This requires City Council to lean heavily on the expertise and judgement of the Development Authority as to whether the wording and parameters of the DC District are sufficiently tight and appropriate. It seems appropriate for the CBMCA to defer to City Administration on this matter.

Zaakir Karim

Director, Planning and Development Committee
Cliff Bungalow-Mission Community Association
cbmca.development@gmail.com