

Letter from the Cliff Bungalow-Mission Community Association

Cliff Bungalow-Mission Community
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July 3, 2018

The City of Calgary

RE: LOC 2018-0143

Parcel Address: 2412R 5 ST SW

Decision: Opposition¹

1. Introduction

The Cliff Bungalow-Mission Community Association (CBMCA) has reviewed LOC 2018-0143 (the Application). Based on our review, the CBMCA expresses its opposition in relation to the Application. Our specific comments about the Application are provided in Section 3 below using The City's questionnaire format.

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 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.

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2. Preamble

The neighbourhoods of Cliff-Bungalow and Mission (the Community) are twin turn of the century communities whose unique character has been informed by our unique biophysiography and the quality of our built environment, which maintains a legible and coherent arrangement of residential and commercial buildings, grounded by historical context.

These qualities in addition to creating a strong sense of place and community also provide the City of Calgary (The City) with its best example of a neighbourhood, which embodies the principles of Smart Growth (a central tenant in the City's Municipal Development Plan).

Yet despite its exemplary nature as a model neighbourhood, the Community faces a number of pressures, which threaten to irreparably harm its unique character. A review of the Community's alignment with the City's principles of Smart Growth and the threats to those principles are summarized below to provide context for our specific comments to the Application (Section 3).

Our Community & Smart Growth

The dominant elements of Smart Growth embodied by our Community are presented below.

Compact Communities with a Range of Housing Opportunities

Our Community is one of Calgary's most dense neighbourhoods (Calgary Herald, 2013). At an average density of 8,945 people/km², the Community is Calgary's fourth most dense, yet its urban form remains ostensibly human-scale in comparison to its peer group (see for example China Town at 8,274 people/km² and Beltline at 8,999 people/km²).

While our Community is compact it also manages to provide a range of housing opportunities including: single detached, semi-detached, row house, suited character homes, apartments and condominiums. This stands in sharp contrast to The City average, where nearly 60% of the housing stock is comprised of single detached homes (City of Calgary, 2014).

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Walkable Mixed-Use Neighbourhoods

Cliff Bungalow has Calgary's highest walk score and the combined neighbourhoods of Cliff Bungalow and Mission rank 7th overall in terms of walkability (Walk Score of Calgary Alberta, 2014). This is readily apparent to anybody walking down 4th Street. Our selection of services includes health and dental care, banks, pharmacies, grocery stores and a variety of shops, restaurants and boutiques making our Community one of Calgary's few truly complete communities. It is perhaps unsurprising to note that our walkability has translated into our Community being Calgary's only neighbourhood where vehicle ownership is less than 1 per capita (NRC, 2009).

Distinctive, Attractive Communities with a Strong Sense of Place

Nestled between the "cliff" and the Elbow River, our Community's unique and attractive character is further informed by its remaining stock of heritage buildings and tree-lined streets. Along 4th Street, buildings like Bannerman and Wright Blocks provide a glimpse to an earlier time. In the spring, the early morning air is filled with songs of robins and in the evening with the scent of lilacs and fruit blossoms. In the fall you see that the fruit trees here are surprisingly productive. Throughout the year, 4th street is a bustle of activity from first light to late evening. Neighbours often recognize each other to say hello and it is not uncommon to see people stopping to chat, pet a dog and engage in some idle gossip. These qualities give our neighbourhood a strong sense of community, shared by those who relate and identify with its strong sense of heritage, liveability and place.

Threats to Our Community

Some of the threats faced by our Community are summarized below.

Un-Collaborative Development Process

One of the key tenants of Smart Growth is to encourage community and stakeholder engagement in the development process. As a key stakeholder in redevelopment and planning, we believe that we should have a seat at the table early in the design process. Too often however, we are invited to comment on a proposed development only after it has been submitted to The City. At this stage, time and resources have already been allocated to produce a single design solution. Additionally,

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the proposed design often presents architectural forms that are devoid of care for the public realm or reference to the unique nature of the Community. At this stage we find our options for promoting the interests of the Community greatly limited. This sets the stage for a process to evolve where The City, the Community and the applicant are less likely to collaborate but instead engage each other in an adversarial manner. Good outcomes are rarely achieved under such circumstances.

Insensitive Redevelopment

Infill and redevelopment that ignores place, scale, massing, materiality, heritage and community values (all of which are discussed within our ARP's) diminishes the Community's sense of place. Perhaps more insidiously, this often creates the reference standard by which the next development is judged. It is disheartening to see projects, which reference other recently completed (and often-insensitive developments) as the justification for their own inappropriate design solutions. This cycle of development if left unabated threatens to irreparably harm the Community. Not because any one development causes irreparable harm but because overtime the cumulative impact of these developments erode and degrade the character of our Community which has come to inform our citizens sense of place.

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3. Comments on the Application

The CBMCA is pro-densification. We believe that inner-city communities each play an important role in accommodating the expected doubling in population over the next 60 years. However, we believe that densification can be achieved under current policies and in sensible ways. At nearly three-times the allowable height, the CBMCA is opposed to application LOC2018-0143 for the reasons described below:

- **We value good planning practices:** We strongly believe that it is the City's responsibility to provide a stable planning regime that provides residents with a sense of security as to what the future of Calgary looks like. The practice of spot upzoning is in direct conflict with this responsibility. Approving the proposed land use amendment effectively implies that the City hands over its planning function to developers, who now are in charge of deciding where increased height is 'acceptable' and 'desirable'. Ad hoc height relaxation introduces a level of unpredictability that is inappropriate from the perspective of community residents, contradictory to good city planning, and could unintentionally set a precedent – moving even further away from a planned approach to sensible densification.
- **Our ARP continues to be a valid planning document:** The application is in direct conflict with the objectives, policy and intent of the Cliff Bungalow ARP, which calls for sensible densification and a maximum height of 16 meters on the proposed site. The Cliff Bungalow ARP is the result of a seven-year process, hundreds of person hours and thousands of hours of volunteer capital, and was developed with the intent of accommodating inevitable growth while retaining the essential character and livability. We note that the Applicant questions the validity of the ARP – this is both disingenuous and incorrect.
 - Disingenuous because it shows how little in tune the Applicant is with the community. In June, 2016 the CBMCA organized a community-wide workshop to hear directly from residents what they think of certain planning matters. The majority of respondents (85%) agreed that the ARP should be respected by the City and developers at all times. Of the people that agreed, 64% strongly agree, while 10% of the respondents don't believe that ARPs need to be taken into consideration at all times. Taken together, these results show that ARPs are still considered valid documents in guiding future developments and conversations with developers.
 - Incorrect, because the Cliff Bungalow ARP has, in fact, been reviewed by Planning and aligned to current LUB 1P2007 and the MDP, and is used by administration as the relevant statutory planning document. Also, the ARP is a values-based document. Those values are still relevant and up to date and very much reflective of the language and intent of the MDP.
- **Densification doesn't equal tall buildings exclusively:** At an average density of 8,945 people/km², Cliff Bungalow-Mission already is Calgary's third most dense community, yet its urban form remains ostensibly human-scale in comparison to its peer group (see for example, Chinatown at 8,274 people/km² and Beltline at 8,999 people/km²). Cliff Bungalow-Mission is one of the most desired communities exactly for that reason – its ability to accommodate many people and small businesses while retaining a sense of place and cultural context. The introduction of excessively tall buildings (Cliff Bungalow currently has no building reaching 45 meters), does not align with these attributes and is likely to compromise the unique character of the community. Tall buildings have few if any benefits. There is a growing body of evidence that shows that they have poor environmental performance, threaten the social cohesion of communities, lead to poorer health outcomes, degrade the public realm and adversely affect the human scale of a city². This is being echoed by community residents. Results from our most recent community-wide workshop show that the

² Gifford, 2007; NCR, 2011 and Loomans, 2014

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majority of respondents (84%) agree that densification (i.e. taller buildings) should happen within existing allowed zoning, as opposed to spot upzoning. Of the people who agreed, 72% strongly agree, while 16% didn't express real concerns with spot upzoning. This shows to us that height remains a concern and that height relaxation is not desirable when being proposed.

- **We already deliver on the MDP targets:** Our community exceeds the MDP densification targets. The amount of people living and working in the community today is 50% beyond what the City asks us to accommodate³. And if we would fully build out to existing zoning as approved under the ARP our density would be three times as high as the target⁴. The argument raised by the Applicant that "*as this Plan [ARP] no longer aligns with current city-wide objectives, the project team has looked to higher order policy documents including the Municipal Development Plan (2009)...*" is simply incorrect and unfortunate, as it wrongfully suggests that the proposed development is necessary to deliver on "higher order policy".
- **We value honest communication:** We raise some concern in relation to the concepts that the Applicant introduces in its external communications for justifying the increased height (<https://www.riverwalkseniors.com/wp-content/uploads/2018/06/18.05.31-Vision-Brief-v.1.0-WEB.pdf>). The Applicant suggests that the site across 25 Avenue SW is a proposed *Future Comprehensive Plan Area*. This is both speculative and misleading, as this appears "self-proposed" and to our knowledge doesn't have policy backing. We genuinely hope that the City does not make planning decisions based on speculative notions raised by developers and we hope that the Applicant is transparent and truthful about the speculative nature of concepts like *Future Comprehensive Plan Areas* when it uses this in conversations with external stakeholders.
- **We value facts:** We are aware that councillors have argued that increased density should be situated around corridors or main streets. It is disingenuous to consider 25 AVE SW as either a corridor or a main street. The City's own traffic studies and Main Streets program confirms this fact.

Going forward

This letter is not meant to suggest broad-based opposition to change or to the proposed use – quite the contrary. We've been welcoming much change in our community in recent years. Much of this change has been within the parameters of community values, reason and the ARP while contributing to the City's objective of densification. We also take this development very seriously – that's why we organized two community-wide workshops for two years in a row – reaching more than 150 community residents in person – with the objective of hearing the community's stance on planning matters like height relaxation. Taking their input, and based on the rationale above, we strongly believe that the proposed development, at 45 meters and an FAR of 7.5, is out of place and harmful.

The MDP is the guiding document of planning for the City of Calgary. In section 2.3.2 it states as its 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.*" Currently, the proposed development is surrounded by two to three story residences and businesses. The site also acts as a transition from the commercial area on 4th Street to the east and a gateway into the community from Elbow Drive and 4th Street to medium height residential use. There are strong indications that the scale of the suggested development is not compatible with the surrounding neighbourhood and the objective of the MDP.

³ MDP asks for 100 people + jobs / hectare. Our community currently accounts for 157.

⁴ MDP asks for 100 people + jobs / hectare. Existing zoning allows for 298.

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We welcome conversations with the City and the Applicant to envision collectively what the proposed use could look like, while celebrating and respecting the community context and MDP objectives. For example, if the Applicant is set on a 45 meter building, we would be happy to explore opportunities south of 25 AVE SW (on the Mission side), or as part of policy in the concept plan for the Holy Cross site – areas where the proposed development would be supported by existing zoning and wouldn't present the risk of setting an unintentional precedent.

We would also like to invite you to read our attached community workshop "What we heard" documents, as a testament to our community engagement efforts which figure prominently in imagineCALGARY, the MDP and the Cliff Bungalow ARP.

4. Closure

Thank you for your consideration in this matter,

Sander Jansen, MSc.

Planning & Development Director

Cliff Bungalow-Mission Community Association

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