

Urban Form & Corporate Strategic Development
City Planning

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May 23, 2018

Edmonton Metropolitan Region Board
#1100 Bell Tower
10104 -103 Avenue NW
Edmonton, AB T5J 0H8

Edmonton Metro Region Board

MAY 24 2018

RECEIVED

Attention: Neal Sarnecki

Dear Mr. Sarnecki

RE: Referral of File LDA17-0510 - Edmonton South, Allard

- **Allard Neighbourhood Area Structure Plan Amendment - Bylaw 18293**
- **Rezoning Bylaw – Bylaw 18294**

Please accept this letter from the City of Edmonton requesting the Edmonton Metropolitan Region Board endorse the enclosed Bylaws 18293 and 18294 in reference to the Ministerial Order No. MLS:111/17. Edmonton City Council gave First and Second Reading to the above-noted Bylaws on February 26, 2018.

The application is being referred as it meets the following submission criteria under Section 4.2 of the Regional Evaluation Framework (REF):

- g) The proposed statutory plan amendment results in a decrease of the planned density of the statutory plan area
- j) The plan area of the proposed amendment to the statutory plan includes a Park and Ride or Planned LRT line or the boundaries of the proposed amendment to the statutory plan are within 0.8 km of a Park and Ride or Planned LRT line as identified on Schedule 10B: Transportation Systems - Regional Transit and Rails to 2044 in the Edmonton Metropolitan Region Growth Plan.

In summary, the subject plan amendment proposes to redesignate a parcel of land in the southwest corner of the Allard neighbourhood, to allow for the development of row housing instead of low rise apartments and/or stacked row housing. This parcel is located within 0.8 km of a planned LRT, located across James Mowatt Trail SW, in the Desrochers neighbourhood. The amendment effectively decreases the planned density for the Allard neighbourhood by 1.1 u/nrha (units per net residential hectare), from 38.2 u/nrha to 37.1 u/nrha.

Attached to the letter consists of the following supporting documents:

- Appendix 1: Bylaws 18293 and 18294 with the Urban Form and Corporate Strategic Development Report
- Appendix 2: EMR Principles and Objectives Chart
- Appendix 3: Allard Neighbourhood Area Structure Plan

Background Context

As background, the subject parcel has been left undeveloped, in part because of servicing issues which limit the possible density for the site, since it was previously rezoned in May 2007. At that time, it was thought that as adjacent privately held parcels were proposed for development, solutions for those issues would become apparent. However, that has not been the case, and the challenges remain unchanged for the parcel. As one of the last undeveloped sites in the area (including in the Desrochers Neighbourhood to the west), there is no opportunity to accommodate additional density in other parts of the neighbourhood.

The associated proposed rezoning, Bylaw 18294, proposes the subject land to be rezoned from RA7 (Low Rise Apartment Zone) to RF5 (Row Housing Zone) under the City's Zoning Bylaw. Although row housing is allowed under the RA7 zone, the Allard NASP specifies that this site should be developed as *Low Rise/Medium Density Residential 1* compared to *Row Housing/Medium Density Residential 2*. This difference is described in further detail in the following sections.

RATIONALE FOR DECREASING DENSITY (REF Section 4.2.g)

Rationale for Amendment to Allard Neighbourhood Area Structure Plan (NASP)

The proposal for row housing in the subject location does not meet the current NASP's land use designation for the site (currently MDR1):

Medium Density Residential 1 (MDR1), also referred to as Low Rise/Medium Density Housing, will typically be developed as 4 storey apartments or stacked row housing through the application of the RF6 or RA7 Zone of the Edmonton Zoning Bylaw 12800 with an average density of 90 units per ha.

Medium Density Residential 2 (MDR2), also referred to as Row Housing, will be developed through the application of the RF5 Zone of the Edmonton Zoning Bylaw 12800 at an average density of 45 units per ha. When developed along a collector roadway, alley access shall be provided.

The proposal for row housing in this location is better suited to the MDR2 designation. Although row housing is a permitted use within the RA7 (Low Rise Apartment Zone) and RF6 (Medium Density Multiple Family Zone), the specific requirement for four storey apartments or stacked row housing under the MDR1 designation in the NASP would have triggered the requirement for a plan amendment at the subdivision stage.

Rezoning Rationale

In addition to the previous section, even though row housing is a permitted use under the RA7 and the RF6 Zone, regulations for row housing in both the RA7 and RF6 zones are more restrictive than in the RF5 (Row Housing Zone), and would limit the development of the site:

- In the RA7 Zone the minimum site size limits the development of row housing to bareland condo development instead of fee simple lots. This would mean that the whole site would need to be developed at once by one builder.
- The RF6 Zone is also typically built as bareland condo development, and also requires large side yard setbacks for row housing, which also restrict the efficiency of the site.

In light of both the NASP policies, and the zoning requirements, the applicant determined that the RF5 Zone would be the most appropriate for the site to accommodate row housing with multiple builders in a staged approach, while using the land most efficiently.

Technical Rationale

In addition to the above, technical considerations that led to the submission of this application are provided in the attached report to City Council. The following augments the attached information.

Access to the site is limited due to its location at the corner of James Mowatt Trail and 41 Avenue SW, both major arterial roadways. No access is permitted to 41 Avenue SW and only a right in/right out is permitted to James Mowatt Trail. Access to the site is currently provided with a cross lot access easement through the medium density parcel to the north. All traffic would have to be funneled through this adjacent separately titled parcel. The parcel directly to the east, was until recently privately owned with the original farmer still residing on the land and access through that parcel was not a possibility. This land has since been acquired by the developer, and can now provide access. The land to the north of this newly acquired site is already built with lower density built forms and was not designed to accommodate the additional traffic that would be created from a low rise apartment site on the subject property.

Additionally, Section 8.2 of the REF supports continued development of plans that were based on density targets of the previous Growth Plan. It is understood that this means the density for the Allard statutory plan needs to maintain current overall planned residential density, pursuant to interpretation of the grandfather clause by the regional board. Acknowledging this, we would like to point out that the proposed NASP amendment results in an overall planned residential density at the higher end of the density range for the area of the previous Growth Plan (Cw: 30 - 40 u/nrha).

REVIEW REGARDING TRANSIT ORIENTED DEVELOPMENT (REF Section 4.2.j)

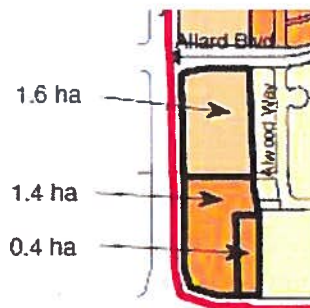
Edmonton Metropolitan Region Growth Plan (EMRGP)

The Edmonton Metropolitan Region Growth Plan (EMRGP) indicates objectives for development within 800 metres of planned TOD centres (major transit stations). These areas should accommodate growth through increased residential densities and the incorporation of a mix of medium and higher density housing (Objective 4.5.5 of the EMRGP). The aspirational growth targets are identified for these areas as 140-160 people + jobs per gross hectare.

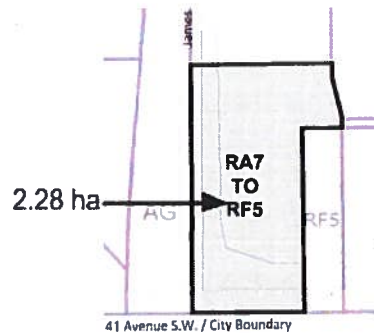
This parcel is located within 800 metres of a future LRT station, and therefore is guided by the EMRGP objectives and is within the target range. The parcel has not yet been subdivided, and is part of a larger 3.4 ha site. As a whole, this site meets the intent, as well as the target density, with approximately 143 people per gross hectare. This calculation is based on the gross developable area of the site prior to subdivision. As the plan statistics are conceptual at the NSP level, and may not reflect the subdivided form, the calculations are considered estimates at this point.

The calculation is based on a site area of approximately 3.4 ha of developable land, of which about 1.6 ha falls under the NASP land use designation MDR1, and the balance of the site (about 1.8 ha) under MDR2. Calculations are as follows:

- "Medium Density Residential 1 (MDR1)" - This 1.6 ha portion of the site X 90 units/ha X 1.8 persons/unit = 259 people
- "Medium Density Residential 2 (MDR2)" - This 1.8 ha area portion of the site X 45 units/ha X 2.8 persons/unit = 227 people
- Adding these two portions together = 486 total people divided by the total gross area of 3.4 ha = 143 people/gha



Gross Developable Land



Rezoning Area

CONCLUSION

In summary, in consideration of the approved Allard Plan and the requirements of the Medium Density Residential 1, the unique technical servicing constraints and development restrictions for the subject site, the proposal meeting the Edmonton Metropolitan Region Growth Plan Objectives and being within the approved target density range of the former Growth Plan of 30 to 40 units u/nrha, and the minor nature of the reduction in residential density, the City requests the referral be endorsed.

If you have any questions or require further assistance with this matter, please contact Beatrice McMillan, Senior Planner, overseeing this referral (780-496-6177), or myself.

Thank you for your time and attention to this matter.

Yours truly,

Livia Balone
Director,
Planning Coordination, City Planning Branch
Urban Form and Corporate Strategic Development
780-496-6279

LB
Enclosures

