



REF 2018-005, City of Edmonton Allard Neighbourhood Area Structure Plan Amendment

Recommendation

EMRB Administration recommends that REF application 2018-005 be rejected.

Background

On May 24, 2018, the EMRB received an application from the City of Edmonton (the City) for approval of a proposed amendment to the Allard Neighbourhood Area Structure Plan (NASP). The City submitted the proposed amendment pursuant to the following submission criteria in the Regional Evaluation Framework (REF):

- 4.2 *A municipality must refer to the Board any proposed amendment to a statutory plan that meets one or more of the following conditions:*
- g) The proposed statutory plan amendment results in a decrease of the planned density of the statutory plan area.*
- And,*
- 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 Trails to 2044 in the Edmonton Metropolitan Region Growth Plan.*

EMRB Administration deemed the application complete on May 24, 2018.

Application

The purpose of the proposed amendment is to redesignate a parcel of land in the Allard neighbourhood to allow for the future development of row housing instead of low rise apartments (and/or stacked row housing) as previously planned.

Evaluation

EMRB Administration obtained the assistance of Lovatt Planning Consultants Inc. to evaluate the application with respect to the REF requirements. The Lovatt evaluation (attached) reviewed the proposed NASP amendment in relation to the objectives of the Edmonton Metropolitan Region Growth Plan in Section 8 of the EMRB Regulation 189/2017, the Principles and Policies of the Growth Plan, and the remaining evaluation criteria in Section 8 in Schedule A of the REF Ministerial Order MSL 111/17. The Lovatt evaluation recommends that City of Edmonton's amendment to Allard NASP be rejected by the EMRB.



EMRB Administration Comments

The proposed amendment to redesignate the subject area from Medium Density Residential 1 to Medium Density Residential 2 has the effect of decreasing:

1. the overall planned density of the NASP; and,
2. the density of a site within a Transit Oriented Development (TOD) Centre.

1. Overall Planned Density of the NASP

According to the submission by the City the result of the proposed statutory plan amendment reduces the overall planned residential density of the Allard NASP from 38.2 dwelling units per net residential hectare (du/nrha) to 37.1 du/nrha. The NASP was approved under the previous Capital Region Growth Plan (CRGP) and was subject to the Priority Growth Area C_w density target of 30-40 du/nrha. Therefore, Section 8.2 of the Regional Evaluation Framework is applicable to the evaluation of the proposed statutory plan amendment:

8.2 Notwithstanding 8.1 above, when evaluating a statutory plan amendment to a statutory plan, other than a municipal development plan, approved by the Board under the Capital Region Growth Plan: Growing Forward, the Board may use the density targets of that plan rather than the density provisions within the Edmonton Metropolitan Region Growth Plan. All other provisions of the Edmonton Metropolitan Region Growth Plan shall be in effect for evaluation purposes.

Section 8.2 gives the Board the flexibility to relax the density requirements of the new Edmonton Metropolitan Region Growth Plan (EMRGP) to the previously approved CRGP density ranges for amendments to statutory plans. The rationale for Section 8.2 was that increasing the density to meet the new EMRGP requirements may require upsizing infrastructure that has already been planned or constructed based on the CRGP densities. For example, if a developer had met the minimum density of the CRGP – 30 du/nrha – and wanted to amend the statutory plan to increase the density to 35 du/nrha, it could be supported, rather than requiring the developer to meet the new minimum, in this case, of 45 du/nrha. While supporting a decrease of density within the range was not an intent of Section 8.2, it is not explicit and the Board may consider other technical factors in support of a reduction.

In this regard, EMRB Administration reviewed the City's considerations in support of the proposed reduction in the overall planned density of the NASP as shown in the table on the next page.



Edmonton Technical Considerations	EMRB Review
The site has limited vehicular access - abutting two arterial roadways that do not allow direct access to the site, due to the separation distances as outlined in the administration's Access Management Guidelines;	See comments below regarding direct east access now available to the site.
Technical challenges due to shared access/servicing cause limitations to development on the site - Under existing RA7 zoning, access and servicing to the subject site would be required through the RA7 zoned site to the north, requiring cross-lot servicing. This access/servicing through the site to the north would also limit the developability of that site;	It appears that cross-lot servicing through north lot may be required to meet legal access requirement – see above City comment. However, it is noted below that direct access/servicing is now also possible from the east, eliminating the cross-lot access/servicing issue.
No existing access through built out area – Access cannot be provided from the northeast due to existing low density residential development;	Access can be provided from east pursuant to City comment below. Further, as a TOD site it should be anticipated that other available transportation options will reduce the amount of traffic from the site and not impact the existing low density residential development.
Developed neighbourhood - This site is in the last corner of the Allard neighbourhood to be rezoned for development, so using other sites to offset the decrease in density is not a viable option. The remaining site zoned (AG) Agricultural Zone to the east cannot support the higher density required to offset this decrease;	Not a technical consideration.
Legal access via local roads - The AG zoned site to the east was owned by another party until recently. With an ownership change, it is available for use to provide legal access to the subject site; and	The cross-servicing access issue is resolved by this comment.
Reduced anticipated traffic impacts – With the access from the east now available, the density decrease will reduce traffic impacts through the low density residential portion of the neighbourhood.	As a TOD site it is anticipated that other available transportation options will reduce traffic and therefore support a higher density housing form as originally planned.

Based on the analysis above, there does not appear to be any technical justification for reducing the overall density. Therefore, the reduction in the overall planned density of the NASP resulting from the amendment is inconsistent with the EMRGP principle of achieving compact growth that optimizes infrastructure investment and policies that encourage more compact housing forms and increasing density in centres such as the subject TOD Centre.



2. Transit Oriented Development (TOD) Centre

The proposed amendment from Medium Density Residential 1 to Medium Density Residential 2 supports a reduction in density from 90 du/nrha to 45 du/nrha within a TOD Centre as shown on Schedule 2 of the EMRGP. According to Policy 4.5.5 of the EMRGP:

In the metropolitan core and metropolitan area, TOD centres will be identified, planned and developed as locations around major transit stations to:

- a. *accommodate growth through increased residential and/or employment densities within 800 metres of the major transit station in accordance with the TOD centres density target in Schedule 6;*

The lands of the proposed amendment are located between 200-500 metres of the TOD Centre.

The EMRGP provides significant direction and support to maximizing the use and density of the lands within a TOD Centre, including:

- Principle 4 - Achieve compact growth that optimizes infrastructure investment.
- Principle 5 - Ensure effective regional mobility.
- Key Strategy – Responsible Growth - using land and resources efficiently for the benefit of current and future generations.
- Policy Area 4: Objective 4.5 - Plan for and develop mixed use areas and higher density centres as areas to concentrate growth of people and jobs.
- Policies:

3.1.4 In the metropolitan area, greenfield areas will be planned and developed as complete communities that:

g) incorporate higher density uses along existing and planned transit corridors and at major transit stations.

4.5.1 Centres will be planned and developed to accommodate higher density development and shall meet the specified centres density target identified in Schedule 6.

5.3.1 The locations, types, scale and built form of residential, commercial, institutional and industrial uses will be planned and developed to optimize the use of transportation infrastructure to ensure efficient, convenient and safe movement of people and goods.

In this regard, a major reduction in the density of a site within a TOD Centre conflicts with the direction of Growth Plan.



EMRB Administration agrees with the REF Consultant evaluation and supports rejection of the NASP amendment by the Edmonton Metropolitan Region Board.

Recommendation

EMRB Administration recommends that REF 2018-005 be rejected.

Attachments

Evaluation	Lovatt Planning Consultants Inc.
REF Documents	1. Cover Letter - Edmonton Allard NASP Amendment 2. Resubmission LDA17-0510 EMRB