March 20, 2018

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

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:

  g) The proposed statutory plan amendment results in a decrease of the planned density of the statutory plan area

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 effectively decreases the planned density for the neighbourhood by 1.1 u/nrha (units per net residential hectare), from 38.2 u/nrha to 37.1 u/nrha.

The current application made to the City of Edmonton was made by Stantec Consulting Ltd as the consultant, on behalf of HV Developments Ltd.
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 the density in other parts of the neighbourhood.

Furthermore, the planning consultant has indicated that, although the density in the Allard NASP is currently approved at approximately 38 units per net residential hectare (unrha) and the proposed amendment will reduce the planned density to 37 unrha, the Allard neighbourhood’s actual density far exceeds the Edmonton Metropolitan Region Board’s density targets. The Allard neighbourhood is the first neighbourhood in Edmonton to develop zero lot line housing, a smaller and narrower built form. The neighbourhood has continued to develop out with smaller and narrower lots as well as a mix of row housing, low rise apartments and mid rise apartments. Calculating the density of the neighbourhood based on actual registered lots and units, a density of 52 unrha is currently developed within the Allard 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 I’ compared to Row Housing/Medium Density Residential 2. The intent of the two unique land use designations in the plan were to work together to ensure densities near Light Rail Transit (LRT) stations remained at a level that supports Transit Oriented Development (TOD) in accordance with the City’s TOD Guidelines approved by City Council. The attached report describes how the proposed amendment fits in with those guidelines.

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 support 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/ha).

A copy of the following support documents and information is enclosed:
- Proposed statutory plan amendment bylaw documentation
- Report to Edmonton City Council explaining the proposed statutory plan
  amendment
- Copy of the most recent approved Allard Neighbourhood Area Structure Plan
- EMR Principles and Objectives Chart

The EMR Principles and Objectives Chart compares the regional principles with related
aspects of the proposed amendment. Worthy to note are the following major met
principles:

- 3.2: Plan for and promote a range of housing options
- 4.1: Establish a compact and contiguous development pattern to accommodate
  employment and population growth
- 4.3: Plan and develop greenfield areas in an orderly and phased manner to
  contribute to complete communities

Conclusion

In summary, with consideration given to the unique technical servicing constraints for the
subject site along with development restrictions related to the pattern of development on
surrounding land, the Edmonton Metropolitan Growth Plan Principles being met through
the proposed NASP amendment, the proposal aligns with the City’s TOD Guidelines, and
the minor nature of the proposed residential density reduction that it is close to the top of
the former density range for the area, 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,

Fe Villamayor
Bylaw Amendment Officer
Planning Coordination, City Planning Branch
Urban Form and Corporate Strategic Development
780-423-6888

HV
Enclosure