



Edmonton Federation of  
**Community Leagues**

...where neighbours meet and great things happen!

November 12, 2008

Mr. Mayor, members of council,

The Edmonton Federation of Community Leagues finds much to support in the proposed Municipal Development Plan and the Transportation Master Plan, but is disappointed with several aspects of both documents. Our support is not based on a lot of enthusiasm or confidence in the Plans' ability to make a change for the better.

Although these plans ought to significantly reduce uncertainty and therefore conflicts between communities and developers, they do not help citizens or members of the development sector understand the kind of changes they might expect. Fostering uncertainty should not be the goal of municipal plans of this magnitude and importance; yet that is what they do.

### **Background and Process**

To begin though, it is necessary to describe the background of this submission. A number of people who are also members of various community leagues city-wide contributed to the focus groups that helped develop the plans. These citizens were not EFCL representatives however. Due to the tight time lines imposed on the EFCL by the Administration it has been difficult to get informed feedback on this matter in a formal way from the EFCL general membership. EFCL circulated the notice of public information meetings to all CL presidents as soon as it was received. However the time allowed was inadequate for meaningful participation, especially considering most community league leaders have not been involved in the projects and are unaware of their directions and implications. We tried, but the result wasn't wholly satisfactory.

The two plans in question were officially released to us and the public on or about October 6. This submission only began to take shape with the October 22 meeting of the EFCL's Planning and Development Committee. Preliminary discussions at that meeting were explored further in an on-line collaboration by a subgroup of that committee. They consist of attempts to synthesize overall impressions by those community members who took part in the process and a selection of items that disturb us.

Since the EFCL Board of Directors does not meet until November 13, the final product of that collaboration was circulated to the members of the EFCL Board by e-mail for comments. As the EFCL bylaws make no provision for voting by e-mail, this material is not yet an official EFCL position.

### **Themes of compact urban form and public transportation**

The two central themes: a more concentrated city and a shift towards public transportation rather than excessive reliance on the single occupant automobile are certainly welcome. It is difficult to disagree with such qualitative hopes and aspirations; after all, who would plan for a less healthy, energetic city than what we have now? Further elaborations of what constitutes

high quality communities such as walkability, logical land use patterns, good architectural design, publicly funded support for transit, coordinated planning and decision processes and an emphasis on natural and human environments are all good but nevertheless are very weak in these plans. They do not provide the predictability that communities would hope for and that the Administration and the development sector need to proceed with confidence in implementing those visions. There are no measures to indicate success or failure in these grand objectives.

### **Integrated land use and transportation planning**

From the very beginning, EFCL knew that these two plans are integrally linked but were being done in the traditional “silo” fashion. We therefore were very happy to hear they would at least be jointly managed. While they now demonstrate aspects of coordination, they are still two separate documents and that allows for the inevitable drift back to the “silo” mentality. That is not necessary – other cities accommodate both land use and transportation policy in the same Municipal Development Plan. Even Edmonton did that in the 1980s. Combining both into the MDP makes sense and more importantly ensures that any future amendment to either component automatically involves the other.

Coordinated land use and transportation planning is a logical consequence of the two central themes, and both plans champion that idea, but neither makes it the rule. Neither plan actually states, as official City Council policy, that all future land use planning projects must have a parallel transportation planning component, and that all future transportation planning projects must have a parallel land use planning component. Such a policy is what municipal plans of this stature must contain. These do not.

### **Ambiguous and vague**

The major shortcoming of the plans is their lack of clear direction and strategy. There is a danger in adopting plans that depend on non-existent policy and principles. Broad ambitious goals have a role but are meaningless without explanation, detail and specificity needed to ensure shared understanding of what they really mean, and more importantly to ensure that members of Council, the Administration, the development sector, special interest groups and community leaders all “buy in” as partners of city growth.

At the neighbourhood level, these plans create even more uncertainty and ambiguity. It is EFCL’s strong belief that Edmonton’s communities recognize that change is inevitable and in most cases welcome it. They expect however that change will be for the better and reasonably predictable. The proposed plans are not sufficiently definitive to satisfy that test. Without a clear and unambiguous picture of the nature, scope, and process for change, support gives way to caution, leading to suspicion and occasionally resistance. That is the experience of Edmonton’s community leagues over the past ten years. When the rubber hits the road, will these plans make a difference, or is it business as usual?

Incorporating a strong degree of certainty tells communities what they can expect in terms of this or that type of development. Edmontonians can then choose the communities they wish to live in and know what types of change to expect in the future. It is entirely possible to include an appropriate level of certainty in these two plans with enough flexibility to allow for different means to the same end. That will allow Council, the Administration, the development sector and community leaders to stick with those principles rather than having to modify, change or ignore them just to suit a two year blip in long term growth.

The attached appendix contains a few examples of the plans’ ambiguity and vacuity.

### **Lack of quantitative targets or measurable objectives**

There are two goals in the plans - a more compact urban form and a transportation system favouring transit over the one occupant automobile. They are laudable goals, and communities realize that the objective is to increase density in the central city.

However there is nothing in the plan that sets actual targets for the increase throughout the inner city. The demographers predict a 400,000 population increase over the next 30 years. The MDP fails to give direction on where those people will go or where they will work. It fails to strategically space homes and jobs to reduce environmental impacts of travel. In failing to set targets for the proportion of new growth directed to mature neighbourhoods, the MDP perpetuates Edmonton's reliance on an unfettered free market to define how our city will grow – to whichever site was bought most recently and most cheaply.

Despite an attempt to coordinate land use and transportation, there remains a disconnect. The proposed transportation system is a hub and spoke system with its hub firmly in downtown. Yet 2/3rds of jobs in Edmonton are outside the downtown area. For example the university/hospital complex on the south side is a massive focus for commuters. The plans propose further spreading out of jobs to peripheral industrial areas. The plans lack an understanding of the magnitude of those home/work trips, do not provide a strategy to reduce the quantity of home/work travel and do not set any standard for a desired level of efficiency.

The attached appendix contains a few examples of the plans' lack of quantitative targets.

### **Lack of Commitment**

Whether justified or not, the reality is that communities are skeptical about the City's respect for plans. This attitude is well illustrated by the current MDP and TMP, for there is nothing concrete in them that suggest how they will be implemented, to measure the degree to which implementation occurs, and to tell when we have succeeded. There are plenty of examples, some as recent as a few months ago, of neighbourhood plans being amended to suit the short term convenience of one development proposal or another.

The fact that the Administration relegated the 2009 budget service packages for neighbourhood planning and for improved enforcement of zoning standards to "unfunded" status illustrates clearly a lack of commitment to coherent planning. Both are essential to the success of the draft MDP yet neither is considered a priority. That is exactly what happened to the ambitious but ambiguous objectives of the 1998 MDP; that is why there is skepticism that the grand schemes for implementation will come to be this time.

### **Conclusion**

We ask again, when the rubber hits the road, will these plans make a difference, or is it business as usual? It's not that the plans are bad, it's just that there is little to relieve the skepticism of communities and even less to show the kind of commitment and imagination we might expect from a city that wants to host a world's fair.

The attached appendix illustrates some policies and principles in need of improvement. It also makes a number of constructive recommendations for improving the plans which EFCL respectfully submits for your consideration.

Edo Nyland,  
Vice President (External)

## APPENDIX

### **Examples of points that should have been quantitative.**

1. A study does exist about what to put in the agriculturally rich tract of land on the NE on the riverbank. It should have been used to provide certainty in the MDP.
2. TMP page 29 - The service strategy for public transportation is totally devoid of quantitative targets

### **Examples of ambiguity and vacuity**

1. Page 17 of the TMP. Future Conditions. At least there are quantitative population projections, but there is no recognition of the interaction between population increase and the specific parts of Edmonton in which various demographics will change. Surely details such as this are fundamental to reliable planning of a transportation network!
2. Page 18 of the TMP, "*more than 80% of the population growth by 2040 is expected to occur in the suburban areas*". How does this jibe with the search for a more compact urban form?
3. Page 24 of the TMP - on the one hand the plan suggests having trip generators near transit nodes but limiting parking. On the other hand the plan is quite ambiguous on how transit users will get to the nodes.
4. Page 25 LRT Stations - It seems quite vacuous that the University/Medical complexes on the south side are not recognized as having a major impact on transportation development. Treating them as part of the downtown core seems even sillier.

### **Errors and contradictions will result in future uncertainty and confusion**

For example, Map 3 – mature neighbourhoods – the MDP defines the mature neighbourhoods as those areas defined by the Mature Neighbourhood Overlay in the Zoning Bylaw. However the illustration of that area in Map 3 is not the same area as the one in the Mature Neighbourhood Overlay of the Zoning Bylaw.

### **Ambiguous Implementation and the Delaying of Implementation decisions lead to more, not less uncertainty and instability**

References to external documents lead to future confusion and conflict – for example the EDC urban design principles, the downtown plan urban design strategy, the downtown design guidelines manual among others – such references are meaningless when those same principles are not contained within the MDP or TMP. The bodies controlling those external documents are not required to go through the same form of public involvement or due process that the MDP has to go through, and can change those documents without public knowledge and without rights of involvement – in doing so they will create unprecedented impacts on how the MDP is interpreted and implemented but will be completely isolated from the MDP and TMP in doing so.

We recommend that the plans be amended so that wherever references are made to external documents and non-existent principles, the overriding principles of those documents (not necessarily the whole documents themselves) be incorporated into the MDP or TMP for ease of interpretation and so they would require due process to change in future.

References to non-existent documents are even more unsettling. Examples include “planning and design guidelines” and “neighbourhood design guidelines for developing and planned neighbourhoods” when there is no assurance that such guidelines will be done. Even if they are done, they will not require any formal public approval process and therefore can be unilaterally changed in future without due process.

Well meaning but ambiguous platitudes give no assurance that clarity will follow. The model this 2008 MDP follows is identical to the 1998 MDP which also discounted the importance of definitive and understandable principles and delayed the creation of definitive and understandable principles to future studies. It is now 10 years later and those clarifying principles still do not exist. Most of those critical studies were never done but public decisions continued to be made in the absence of essential clarity.

Communities had to live with uncertainty, ambiguity, confusion, inconsistent interpretations, conflict and in some cases chaos from 1998 to 2008. Communities have little confidence that the next ten years will be different.

We recommend the additional incomplete (“empty”) chapters be added to the Implementation section of the MDP stating that the interpretation of objectives and policies in the Plan must be based on the contents of those new chapters. When those principles are then developed, they will be added to the MDP as amendments to those “empty” chapters through proper due process.

#### Affordable Housing – MDP 3.5

EFCL supports the housing goals of the MDP in terms of variety, choice and the need to help those experiencing difficulty in finding secure, safe homes. Almost every mature neighbourhood already includes substantial supplies of lower cost housing ideally suited to those experiencing difficulty in finding secure, safe homes. The experience however over the past several years, based on the very principles and policies this MDP is advocating, is that the current stock of affordable housing is decreasing rapidly because the City approves virtually every rezoning proposal to demolish existing affordable housing to allow new redevelopment and never comes even close to replacing the units lost in that rezoning. 5% is a drop in the bucket compared to the amount of affordable homes lost to redevelopment.

We recommend the addition of a new policy – a “no net loss” principle for redevelopment of existing affordable housing sites in mature neighbourhoods – that the same number and type (for example, family oriented or not family oriented) of units existing prior to any rezoning application must be replaced within the new development.

The definition for affordable housing in the MDP is out of date. It fails to account for transportation costs as an integral part of the equation. Low cost housing in the far-flung suburbs does little for the household if the costs of getting to work, to education, to health care and to healthy foods offsets the housing cost. Incorporating transportation cost as part of the definition of affordability is “best practice.” Edmonton should strive for that.

We recommend that the definition for affordable housing include transportation costs.

#### Housing Choices - MDP 3.4

Edmonton has tried to ensure a variety of housing types in new neighbourhoods based on a reasonable balance that ensures certain attributes essential for healthy communities are sustained. . In mature neighbourhoods however there are no targets and no limits – anything goes, even if it destroys the essential characteristics that made the community attractive in the first place. If an upper limit of 35% multi-family housing is a sound planning principle for a healthy sustainable suburban community (unaffected by premium transit locations), then it should be just as applicable to any neighbourhood similarly unaffected by premium transit locations.

We recommend Policy 3.4.1.5. be amended by adding the phrase “and mature neighbourhoods” as follows:

*Developing and planned neighbourhoods **and mature neighbourhoods** with no premium transit locations should not have more than 35% multiple units.*

#### Parks and Open Space – MDP 6.4

Community parks are the foremost public feature in a neighbourhood. They contribute to a community’s unique identity, local distinctiveness, residents’ health and wellness, and they serve best as a common gathering place in which the spirit of community can be hatched, nurtured and celebrated. Nevertheless communities continue to see conflicting demands placed on their open spaces for alternative uses. City policy states that even if a municipal reserve site is disposed of, the proceeds from such disposition will remain with the original community. Reiteration of that principle is warranted in the MDP.

We recommend Objective 6.4.2 be amended by adding a policy that the current standard for neighbourhood public park space will be maintained.

## **Recognition and role of existing neighbourhood area plans**

EFCL strongly objects to the effective disenfranchisement of over 80 neighbourhoods from this planning program. The MDP recognizes only “statutory” neighbourhood plans, and only one type of a non-statutory plan. It fails to carry forward the same level of recognition for the many other kinds of equally valid non-statutory land use plans for dozens of communities across all Wards. Those non-statutory plans were adopted in good faith by City Council and supported in good faith by thousands of volunteer citizens based on hundreds of thousands of volunteer hours. Failure to include them in this MDP debases their value and removes any sense of certainty and stability that those many plans do and will provide to current and future residents and the development sector.

We recommend that

- non-statutory land use plans also be recognized by the MDP as policy documents holding a status equal to statutory neighbourhood plans;
- a map showing the locations of existing statutory and non-statutory neighbourhood-level land use plans be added to the MDP;
- policy be added to the MDP that states amendments to existing statutory and non-statutory land use community plans will not be supported on the basis of the MDP until the “empty” chapters are filled with the necessary policy and guidelines;
- policy be added to the MDP that states existing statutory and non-statutory land use community plans will be reviewed in a comprehensive fashion and amended as necessary to reflect the complete intent of the MDP’s objectives, policies and implementation principles.

## **Recognition and role of the community league movement**

We are disappointed that Edmonton’s oldest, most original and hardest working community development institution is ignored throughout the plans. Community leagues are also active partners in the planning and development of neighbourhoods and transportation systems. Numerous references are made in the plans about other stakeholder groups including business associations, but the exclusion of community leagues is disturbing.

We recommend that community leagues be recognized in both plans and be assigned appropriate roles for planning and redevelopment activities, processes and studies.

## **Integration of land use and transportation planning**

The “silo” affect remains as long as the interdependent objectives and policies for land use and transportation are in separate documents subject to separate procedural rules for changing them.

We recommend that the TMP be incorporated into the MDP to ensure ongoing integration.

We recommend that policies be added stating that it is a requirement that future land use plans must be accompanied by parallel transportation planning, and that future transportation plans must be accompanied by parallel land use planning,