

April 16, 2009

Dear Mayor Mandel and City Councillors,

Re: EFCL Response to Residential Infill Guidelines for Mature Neighbourhoods

The Infill Guidelines are a step in the right direction and provide an approach to increasing density while maintaining the character of mature neighbourhoods. The Guidelines suggest locations for small, medium and large scale infill which may be appropriate for a number of neighbourhoods. They also provide general design guidelines, which once drafted into clearly defined regulations in the zoning bylaw could lead to more quality developments.

However, EFCL has some major concerns about the Guidelines:

- We have no information on what implications the Guidelines will have for the Zoning Bylaw. City Council does not have that information either.
- The one size fits all approach has a differential impact on Edmonton's mature neighbourhoods because some already have been developed/redeveloped or been zoned/rezoned with much more density than others.
- The Guidelines will impact existing ARPs.
- It further perpetuates the City's practice of developing "one size fits all" approaches instead of investing in sound community planning.

Given these concerns, EFCL is not taking a position on the Guidelines at this time. In order to take a position we would need to review:

- draft bylaw amendments reflecting the incorporation of the guidelines into the zoning bylaw
- analysis of the impact of the guidelines on each neighbourhood (Suggest mapping the cumulative existing and potential housing forms using Microstation or equivalent software)
- analysis of the impact of the Guidelines on each ARP
- City's plans to scale up community planning to protect communities from inappropriate use of the guidelines and ensure there are area plans in place to direct redevelopments.

It is our view that City Council would benefit from this additional information as well. We urge City Council to ask Administration for this additional information as part of your consideration of these Guidelines rather than approving them in principle. EFCL would like to receive this information as well.

We would also like to review a proposed amendment to zoning bylaw that would add a maximum density for a mature neighbourhood affected by these Guidelines. It's one thing to agree to increased density in a community; it's another to have to accept any level of increased density.

EFCL is offering to work with the City in developing a Public Involvement Process to review draft zoning bylaw amendments resulting from the Residential Guidelines. We would like to move ahead with this as quickly as possible.

Recommendations concerning specific revisions to the Infill Guidelines are attached.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Gibbens', with a horizontal line extending to the right.

David Gibbens
EFCL President

cc. Gary Klassen, Peter Ohm, Greg Barker, Paula Ainsley

EFCL recommended revisions to Residential Infill Guidelines for Mature Neighbourhoods

1. We support a recent addition to the Guidelines which recommends that Small Scale Row Houses of five units or less may be located directly across from and fronting neighborhood school or park sites, “except in neighborhoods where there is a large site within the interior of the neighbourhood that may be redeveloped to include row housing or where zoning for low rise apartments already extends one block or more beyond the perimeter arterials into the interior of the neighborhood.”

This new clause recognizes that location criteria must take the existing and potential redevelopments into consideration.

EFCL recommends that the principle of the clause applied to Row Housing be applied to other types of housing. Given that a major goal of the Infill Guidelines is to introduce a variety of housing types, neighborhoods already zoned for an abundance of certain types of housing should not be asked to take on additional housing of the same type. For example, neighborhoods like Inglewood and Hazeldean which have the majority of the neighbourhood zoned RF3 allowing for duplexes, should not be required to permit duplexes on every corner of their small RF1 (single family housing) area. Likewise, neighbourhoods that have an abundance of apartments or row housing in the interior of their neighbourhood should not arbitrarily be required to establish apartments on the periphery arterial roads. Ideally each neighbourhood would be studied and rezoning would result from a neighbourhood plan, not from “one size fits all” infill guidelines.

2. Remove vague location guidelines regarding Mid-Rise Apartments (see G1.2.b). To say that Mid Rise Apartments may be located on “sites where the specific context of the site warrants consideration” provides no guidance at all.

3. In the Site Design and Streetscape requirements, add minimum green space requirements for all housing types. The Guidelines specify the need for amenity space requirements, but “amenity space” is ambiguous and may be a cement pad or a deck, and it is not sufficient in addressing the need for retaining vegetation in mature neighbourhoods.

Residents in mature neighbourhoods are going to oppose higher density housing if it means the extensive loss of green space and the green buffer between buildings and yards. This is presently not being adequately addressed in the Guidelines.

4. Given that the goal is to create a compact, but livable city, we question the recent change in the Guidelines recommending that small scale low-rise apartments be allowed to have surface parking. Edmonton needs to reduce the amount of land dedicated to automobiles if we are ever to achieve the vision in the draft Municipal Land Use Plan. Parking policies need to be carefully re-examined.

5. Our highest, most consistent concern is that the Guidelines give too much accommodation to high rise development throughout the city as a solution to urban sprawl instead of focusing such development on particular types of locations. This has weakened the Guidelines from EFCL's point of view. By allowing these developments in

more locations, they may not get built in locations where they are more desirable, e.g. close to LRT, Downtown.

6. The Site Planning and Design Template for large sites establishes building height and form and the transitions between new infill and existing neighbourhoods. The template which takes into account sun shadowing for all seasons should be used for all residential sites, not just large sites.

7. In the Implementation Section of the Guidelines it should clearly state that the Infill Guidelines are subordinate to Area Redevelopment Plans. At present it states that Infill Guidelines will be used to evaluate applications to amend existing ARP's. Instead the ARP should be used to evaluate the application of the Infill Guidelines. This clause will be critical in future years when ARP's are newer than the Infill Guidelines.

8. Mature neighbourhoods will remain attractive places to live, and will remain vibrant communities only to the degree they are able to provide for the needs of residents in all stages of life. We have already witnessed a proliferation of 'adult only' housing redevelopments but there are very few family-oriented redevelopments. This is altering the availability of housing options for families. EFCL supports higher density housing, but the housing must be able to accommodate families, thus EFCL supports the introduction of higher density family oriented housing recommended in the Guidelines -- small lots, duplexes and row houses. Families need ground level, private, secure outdoor space, thus we also support the design guideline which states that apartments must have ground-oriented units which are provided with private outdoor open space. However, the Guidelines need to go further in protecting and promoting family oriented housing, especially on large sites which have a huge impact on the demographic balance of a community.

9. Apartments are recommended housing forms for Transit Oriented Developments (TOD's), but TOD's are not defined. TOD's have created a high degree of uncertainty for communities along proposed LRT routes. EFCL recommends that TOD's not be used as a criteria for reviewing rezoning applications until a TOD study and plan has been completed for the applicable LRT station or major transit station.

10. The "bonusing" system which allows developers and the City to negotiate increased density and height in exchange for contributions to City or community goals needs to be more clearly defined. We need to ensure that the long term quality of the neighborhood is not sacrificed for short term gains.

-Only long term benefits to the neighbourhood should be considered.

-At this time EFCL recommends the benefit be additional park land onsite. A pocket park, planned by the Community Leagues with the existing and new residents will contribute to the integration of the new residents into the community.

-The Guidelines suggest affordable housing could be another "benefit", but this should be a requirement, not a benefit.

-The Infill Guidelines recommend the bonus system be used for non transit oriented large infill sites. The Guidelines recommend a maximum of 6 floors and a maximum density of 125 units per hectare (RA7 zoning for 4 storey apartments) unless bonuses are provided. With bonuses the development could be increased to a density of 225 units per

hectare and the height could be increased. Such a high density would again promote high rises in non-transit oriented locations, to the detriment of developments in transit oriented locations. A lower density should be the limit.

- The density limit and the types of “bonus” should be more clearly defined through a public involvement process.

EFCL looks forward to working with the City on implementing an effective Public Involvement Process to review the “bonusing system” and regulations stemming from the Residential Infill Guidelines.