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Mayor and Members of City Council  
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**RE: CPC2018-1301, LOC2018-0172 at 407 27 Ave. NE** and the proposed amendment to the Winston Heights/Mountview ARP scheduled for the Public Hearing of City Council January 14, 2019.

Dear Mayor and Members of City Council:

The Planning Department and CPC recommended approval of the applications but their analysis fails to take into account a number of site specific and community constraints and ignores several Council policies. The amendments should not be supported in the current form.

The Planning Department report states that, "The proposal meets the objective of applicable policies as discussed in the Strategic Alignment of this report." There is only one policy used to support the application, the Municipal development Plan (MDP) and specifically Section 3.4 Main Streets.

However reviewing Section b. of the Main Streets Land Use policies, the MDP is clear that the highest densities and tallest buildings should be at nodal locations not an uniform high and density along the length of a Main Street. It further says that the nodes should be determined "through a local area planning process."

Further between nodes “lower scales of commercial, residential and mix-use development are appropriate.” There has been no local planning process, and there are pre-existing nodes at 23<sup>rd</sup> and 24<sup>th</sup> Avenues NE, 20<sup>th</sup> Avenue NE, and 16<sup>th</sup> Avenue already designated neighborhood commercial. These sites are consistently under developed according to their approved designations. They are perfect candidates for a mixed use designation with highest densities and tallest buildings. 27<sup>th</sup> Avenue is not node and it is no justification for it to be treated as one. This is a location where lower scale multi family residential between nodes is completely appropriate.

Considering Section h. in the Main Street Land Use policies, the policy is explicit that building scale between Main Street and adjacent areas has to ‘be sensitive to scale, form and character of the surrounding building and uses.

A critical factor, completely missing from the Planning report is the reality that there are 6 of laneless blocks in Winston Heights/Mountview (WHMV) flanking Edmonton Trail. This constraint means all site access can only be from the residential avenues. This was an issue identified in the 2006 development of the WHMV ARP. It lead to the redesignation to a modest multifamily designation M-C1 for those lots that abut Edmonton Trail. Given the laneless nature of these blocks the M-C1 with maximum height of 14m provide a more sensitive interface with the lower density RC-2, maximum 10m height, which makes up the single detached or semi-detached sites to the east.

An example of this challenge of no lanes and no transition can be seen on the site to the north now under construction with the M-C1 designation. The existing adjoining single family dwelling now has 4 stories, 9 front doors and 18 windows arranged along its west flank. The subject application is requesting an additional 10 metres in height to 24m and 6 stories with likely many more doors and windows.

The subject application is also requesting a mix-use designation, MU-2h24 which requires commercial on the ground and 1<sup>st</sup> floors. Mix-use is a main component of the Main Street program implementation however mix-use comes with complication of different parking, access and waste disposal requirements at different times of the day. In other Main Street locations, such as further south from the subject site or west on Centre Street these increased and sometime conflicting requirements can be met from flankage or lane access. Here again access must rely a single point on a residential avenue. Further, 3.4.2 Urban Main Streets Land Use policies indicates

“c. ...Individual Urban Main Street densities and appropriate job and population distributions will be established through a Local Area Plan or within an Implementation Guidebook.”

This has not yet happened, in the Main Streets Implementation Plan update that Council dealt with in April last year, this section of Edmonton Trail was part of the 20 sections recommended for near term action (2018-2020). However some this policy work has been subsumed in the North Hill Communities Local Growth Planning, currently underway with some 32 representative from 9 different north hill communities. This application should not set the bar for redevelopment in advance of the local policy work that’s underway.

Public engagement or the lack of it is another concern. It has been limited to the immediate neighbours, convened by the applicant, poorly advertised. The applicant’s submission says, “The neighbours were satisfied with the solutions presented to mitigate their concerns.” This not the case. As the planning report indicates 10 letters of concerns, many by neighbours who heard about the meeting later, were sent to the planner. The letters were not shared with CPC and concerns summarized in one sentence. The “solutions” offered on response presumably refers to a parking technology that is suspect. More importantly there is no way to ensure that it will part of the development application or final

construction. Even if it was included it also does not answer the questions of constraints, transition, scale and location.

This application represents a major land use precedent not only for the 6 blocks in WHMV but for an equal number blocks on the west side of Edmonton Trail in the community of Tuxedo. Therefore this should be part a broader community planning discussion on how to implement Main Streets in this area not an one off approval.

### Conclusion

The justification for the land use application is weak and in order to mitigate against the more serious issues of scale, intensity and the constrained site, a more respectful solution would be:

1. The maximum height should set at 14m. This will allow a chance for a sensitive transition to the remainder of the adjoining low density on the avenue.
2. The designation should be MU-1h14. This is a mixed use designation with a major difference that the commercial is optional and confine to the ground level. It is a scale that better fits this section of Edmonton Trail.
3. A development permit be applied for at the MU-1h14 designation with adequate public and community engagement and reviewed for parking, access, transition to adjoining properties and other matters that the approving authority thinks appropriate and approved prior to second and third reading of the redesignation and ARP Bylaws.

Respectfully

A handwritten signature in black ink, appearing to read 'D. Watson', written over a horizontal line.

D. Watson