Members of City Council:

On behalf of Holyrood community, the Holyrood Development Committee (HDC) is requesting Council make motions to: 1) refer the Holyrood Gardens proposal back to the developer and City Administration for additional design and neighborhood consultation, and 2) refer this design proposal to the Edmonton Design Committee (EDC) for urban design peer-review. The request to refer this proposal to EDC was initially made on May 3, 2017.

Regency Developments proposal is not an urban model that citizens of Edmonton developed and agreed to when developing infill and Transit Oriented Design guidelines, (TOD). The basic premise of TOD guidelines is to allow infill and density by applying urban design principals to generate sympathetic transitions to surrounding neighborhoods. The appropriate density for any given TOD site will vary with its location and community setting. TOD is intended to be compact and dense compared to its surroundings. To ensure that new infill is not out of scale with residential neighbors or nearby open spaces, a transitional height plane is used to calculate density. This is a 35-45 degree angle extending upward from the line of the adjacent lot. (See page3).

The Urban Land Institute (ULI) defines transit oriented development as one of two urban forms:

A: Low to Medium Density – for residential neighborhoods (typically 42-125 units/HA)
B: Medium to High Density – for commercial, economic centres. (typically, 125-225 units/HA)

The City of Edmonton TOD guidelines apply these principals through definition of “station type” with associated design characteristics. Holyrood is a “neighborhood stop” and the site is currently zoned medium density, suitable for this station type. Citizens of Edmonton know there are systemic problems with rezoning applications being processed in this City. Uncertainty with Edmonton’s land use regulations leaves citizens feeling powerless, especially when the City’s consultation and engagement processes are neither integrated design process nor holistic.

This rezoning application did not consider appropriate consultation processes given its context in mature neighborhoods. HDC is requesting this proposal to be sent to EDC for the following reasons:

**Review by the Edmonton Design Committee**

1.) This DC2 rezoning will fundamentally change the direction of established TOD guidelines. The applicant is seeking numerous variances to TOD while applying High Rise Infill Guidelines without consideration of cumulative impacts on the surrounding neighborhood.

2.) The site shape is irregular– half-block in width. Requests for detailed drawings, wind load impact analysis has not been submitted. Massing studies and urban form development to address the site shape, including building height transitions were not explored. The design concept is basically unchanged from the preapplication proposal with little to no modification given limited opportunity for community feedback.

3.) Community recreation space is not integrated to complement the existing community parks and amenities in the neighbourhood. Open green space was designed in isolation by the City and developer. The tower massing creates negative sun shadowing impacts on the sites public space and on adjacent properties. Resident feedback that public space, building mass orientation and suburban commercial streetscapes do not fit the neighborhood was not acknowledged.

4.) This redevelopment changes the demographic mix of housing types in the neighborhood. The number of affordable housing units (3%) falls well below the City Infill policy to provide 25% affordable housing and new goals for the missing middle housing crisis (affordable housing for seniors and young families).

5.) The rezoning application did not generate a Site and Vision Context Plan required for large sites in the mature neighborhoods. The site vision plan is a critical step in community asset mapping and neighborhood gentrification/planning.

**Traffic Uncertainty:**

1.) The developer’s traffic impact assessment (TIA) is an isolated study primarily focused on the development site. The developer’s TIA does not incorporate recent traffic mapping for intersection congestion along the Valley Line. Two major congestion areas identified in this report also boarder the development site at 90th Ave and 93rd Ave. The Developer’s TIA does not factor existing (or future) commuter short cutting problems in Holyrood.
2.) How do 2047 population projections anticipate rezoning developments that supersede TOD densities. The developer’s proposal is projecting an increase in population of 72% which is considerably higher that the City’s 2047 projections of approx. 46%. This proposal is building out and exceeding 2047 population projections in a single development.

3.) Justification for high modal split projection (.70) including validation through precedent examples in the City of Edmonton and/or inner-city TOD at a low density neighborhood stop.

4.) No undertaking to review safety and walkability implications for seniors, children and vulnerable populations along proposed neighborhood commuter travel paths (e.g., South East Edmonton Seniors Association Activity Centre, GEF Seniors Housing, Holyrood After School Care Society, Holyrood School and Holyrood Community Playground).

Community Values and Aspirations:
The following community values and aspirations have not been acknowledged or acted upon through the consultation process.

1.) Replacement of 160 existing mixed-income, 3 bedroom family units.
2.) Demographic impact study related to housing needs, school enrollment impacts and community stakeholders.
3.) Aligning the developer’s financial contribution to the community with the scale of development.
4.) Solidifying acceptable commercial uses with community.
5.) Solidifying acceptable signage use in the community.
6.) Commitment to social and environmental sustainability responsibility.
7.) Commitment to housing models appropriate to community needs.
8.) Deed restrictions on the number of cars per unit and indoor bicycle storage.

The Valley Line corridor on 85 Street between the communities of Holyrood and Strathearn offers the City of Edmonton the opportunity to set the bar for progressive zoning regulations and increase density through TOD. We are encouraged by the following elements of the proposal and want to see this project succeed.

- Redeveloping a site with old housing inventory.
- Decreasing auto dependency and reducing greenhouse gas emissions.
- Offering publicly accessible green space and amenities.
- Revitalizing mature neighbourhood with medium density mixed use (residential and commercial).
- Improving walkability and access to public transit.
- Locating waste collection and storage areas within building and behind screening.

The Planning brief for this development was submitted August 17th with the final Open House occurring 2 weeks later and the Hearing 5 after that. Council is being asked to make this decision too quickly based on inadequate community consultation and incomplete information.

We look forward to your response in this matter.

Sincerely,
Sherri Shorten, on behalf of the Holyrood Development Committee
Without use of proper planning guidelines in TOD, cities are wasting valuable time, resources, and taxpayer money rather than creating economically successful, environmentally sustainable developments that create more stable and welcoming communities.

Evidence Based Principles for Transit Oriented Development -
Christopher Pennick, ULI, University of Arizona, 1.