

DATE: September 5, 2017
FROM: Jan Hardstaff,
Parkallen Civics, EFCL's ALIDP Representative
TO: City of Edmonton Mayor & Council
RE: CR_4459 Evolving Infill and Middle-Density Housing Interim Report

This report indicates that the needs and wants of developers and economic opportunity rank above objectives. The statement that Evolving Infill should pay: *"continued attention to the needs of residents and housing market readiness,"* appears to confuse the needs of residents (assuming it refers to the needs of residents of mature neighbourhoods) with economics of the housing market. Not that economics is not important, but it is only one part of a much-needed sustainable development model. There is a need to balance this with the social needs of existing and new residents, so that the strong social fabric exists in many mature communities is maintained or enhanced. Finally, the economic and social components must also consider the importance of the environmental impact of development. It is also extremely important, in the light of ongoing extreme climate events and their impact on communities around the world, that every scale of development adopts an environmental resiliency strategy that mitigates the potential for negative impact and consequences that will result without a sustainable development approach.

The report begins with the description of a *"Missing Middle Overlay" and/or base zone revisions for mature areas where: "higher heights, smaller front setbacks, bigger building pockets and more flexibility four multi-family buildings could be warranted . . . near transit nodes and corridors, areas with deteriorating housing stock and with existing ground-oriented multi-family zoning."* Later in the report there is a comment that *"regulatory uncertainty may prove to be a disincentive for developers pursuing medium scale projects* and further to this point *"Edmonton's Zoning Bylaw contains specific height and parking regulations which may make some medium-density construction projects impractical or economically unviable"*. Will the already significant amendments to the Mature Neighbourhood Overlay be even further eroded with a new Missing Middle Overlay and a comprehensive Zoning review? What will become of Area Redevelopment Plans that involved consultation with communities to develop. Will these become obsolete?

It is clear this report continues to see current regulations as an impediment rather than a vehicle to direct development. Current regulations don't allow developers to *"build the types of medium scale housing buyers are looking for. . ."* and *"regulatory uncertainty (or inconvenience when you build outside the regulatory envelope) may prove to be a disincentive for developers pursuing medium scale projects."* Public engagement with developers revealed concern that *"Edmonton's Zoning Bylaw contains specific height and parking regulations which may make some medium density projects impractical or economically unviable."* (Or these regulations do not allow them to build whatever they want unless they rezone to a direct control zoning which would require community consultation). Should Council encourage the tail to wag the dog?

Similarly, with Infill 1.0, developers just could not seem to find a way to *"build within existing regulations what the market demanded"* so the MNO was significantly amended. Yet in this report, Administration is now saying *"single detached homes may become unaffordable as financial barriers increase."* Earlier this week, there was a news article about a Councillor having trouble selling a skinny home that a short time ago we were told there was market

demand for. The report acknowledges current economic constraints and rising interest rates may make single detached homes (the focus of Infill 1.0) unaffordable as financial barriers increase. What happened to the market appetite for new diverse housing stock including \$750 – 800 K skinny homes, over \$1.2 M single family homes or garage and garden suites now that they have become \$200,000 – 250,000 laneway homes? How is affordability to be brought into the Infill 2.0 plan? In Parkallen, the Park One & Park Two Condominiums were built ten year ago replacing three 12 unit walk ups. The density increased 75% which is good, but none of this was affordable at \$450 K which the former walk ups were and units are for adults only. We have parking issues in Parkallen, because we live near the LRT – do we want to relax parking requirements as suggested in the report? Will the results be better with Infill 2.0? Will infill be done more responsibly and with less impact with Infill 2.0. It is hard to say when the direction it is headed is to push the envelope beyond it's regulatory framework.

Other findings included a “*broad acceptance of medium and high scale development along LRT transit corridors*”. This is not the case with the proposed development of 1200 units in Holyrood and negative reaction from the community and others. Will Evolving Infill 2.0 allow developers of medium and high-density infill to set aside guidelines and policies intended to sensitively densify mature neighbourhoods, not only in this community but, as this report suggests, where this “*could be warranted*”? Does the City of Edmonton value the economic opportunities of developers above the concerns of residents required to live with what is built regardless of the effect it may have on the use and enjoyment of private property? Although developers may fund campaigns in the upcoming election, it will ultimately be city residents who vote. Councillors in Wards with mature neighbourhoods must look at infill development and the recommendation in this report objectively and value concerns of both developers and residents.

A number of outcomes are listed in the report, including to “*increase density in older neighbourhoods to maximize the use of existing infrastructure*” and to “*reduce need and cost of developing and maintaining new neighbourhoods, infrastructure and services.*”, as well as “*reduce Edmonton's ecological footprint.*” They do not consider the increased costs that would accompany the need to upgrade infrastructure if development exceeds capacity. They have not factored in the costs associated with more intensive flood mitigation measures are required to offset a significant increase in site coverage and storm water run-off. Nor do these outcomes include costs associated with clean up after significant catastrophic climate events resulting in flooding which impact all residents, especially those who own older homes that are more vulnerable and at risk? Council has yet to decide if flood mitigation is even worth the investment. The report mentions “*modelling work being done for the drainage system.*” Will this report be made public, when and will it include recommendations of low impact development strategies to offset the impact infill development has on the storm water drainage system downstream? Have the costs and benefits of implementing these LID strategies been considered in the outcomes along with the costs and risks of not implementing them? Will the infill capacity for low, medium and high-density infill development be made known for every mature neighbourhood, given the outdated and aging infrastructure existing in mature communities expected to absorb all this density? If all of these things have not been modelled, studied, evaluated and findings incorporated into both Evolving Infill 1.0 and 2.0, then infill development as presented in this report cannot be shown to be truly sustainable and the City of Edmonton is headed in the wrong direction. You can't maintain “*livability and vibrancy*” and ignore the need for “*resiliency*”.

With medium and high-density infill development, comes even greater potential impact on public infrastructure requiring repair or replacement following development. How will the costs of this be captured by developers? Increased density is accompanied by increased development footprint, increased impervious site coverage and as a result, increased storm water run-off. The consequence will be more severe flooding and surface ponding events. (Consider the severe weather event in Burlington, ON, August 5, 2014.) Loss of softscaping and green space along with increased development site coverage means less storm water run-off is absorbed and less shade and shelter provided, resulting in an increase of temperature extremes.

Many neighbourhoods, like Parkallen, have or will undergone Neighbourhood Renewal of public infrastructure, resulting in considerable cost to the City and residents on their taxes. How will the impact on renewed infrastructure and the acceleration of its depreciation be recovered by the City and residents of these communities? The report suggests a “*strong continued interest in secondary and garden suites.*” Having attended a number of public engagement events for communities, I have heard about the high cost of connecting this type of infill to utilities and suggestions to install new utility infrastructure along with lane renewal. Who will pay for this? There likely won’t be any appetite among existing residents to pay for additional utility services along with paying for lane renewal. Potential cost of upgrading utility infrastructure must be factored in to the cost of infill development.

“*Targets and Outcomes*” listed at the end of the report ignore any potential negative impact this scale of development may have on existing residents and properties in mature neighbourhoods, which was an issue with residents of mature neighbourhoods with Infill 1.0 and remains unresolved as Infill 2.0 gears up. Perhaps the following targets and outcomes should be added:

Target	Outcome
<ul style="list-style-type: none"> • Implement LID strategies with every infill development that reduce storm water run-off or offset the impact downstream in the drainage system. • Reduce or minimize other negative development impacts: sun loss, loss of vegetation, flooding, damage to private and public infrastructure. • Factor in the costs of these impacts into the cost of infill development • Ensure quality multi-unit housing is accessible and designed for all ages and demographics including families with children, seniors and the disabled. • Listen to, value, consider and respect the concerns of residents in mature neighbourhoods 	<ul style="list-style-type: none"> • Resilient Neighbourhoods • Flood mitigation, reduced risk and cost to City and residents. • Negative impacts of infill do not result in increased costs to the City or residents of mature neighbourhoods which must absorb infill development. • Not just diverse housing, but diverse, engaged and vibrant communities. • Strong communities connect different demographics and income levels. • Acceptance of infill in mature neighbourhoods

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