



Urban Development Institute
EDMONTON REGION



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March 15th, 2021

Attention: Mayor and Council

City of St. Albert
5 St. Anne Street
St. Albert, AB T8N 3Z9

Re: City of St. Albert MDP Feedback – bylaw #20/2020

Dear Mayor and Council,

Thank you very much for the opportunity to express our position on the MDP – Flourish!

First and foremost, we want to commend the administrative team for the thoughtful and very thorough engagement. We appreciated the ability to engage numerous times throughout the process. We really felt that our feedback was heard and considered and that we had an impact on the document being brought forward today.

We would like to confirm our **conditional support** for the new MDP. We feel strongly that there are remaining sections that need to be reworded in order to avoid confusion or unintended consequences in the future. Although some of the suggestions may seem minor in nature, but to us, the wording matters. We are trying to anticipate and avoid challenges that prescriptive language may cause us now, and in the future. Currently, we are aligned in much of the intention and aspiration of the document, but we need to ensure that the MDP offers flexibility in order to evolve with the market forces. Potential future changes to staffing and interpretation could lead to unintended consequences for all parties. As an example, the use of the word ‘encourage’ vs. ‘ensure’, can demonstrate a goal clearly, but could lead to unnecessary and unintended challenges. Below outlines our outstanding concerns and suggested amendments.

Section 5

- Section 5.1: Could the wording be amended so that the final sentence reads “...ensure that the ecological benefits of natural features are conserved, and potential adverse

effects are understood and avoided, or mitigated where avoidance is not reasonable.” Having it currently worded “is not possible” is problematic, because avoidance is always possible by not developing.

- 5.3.1 – It should be noted that the City does not have LID standards, currently. This should be worded in with more aspirational language.

Section 6

- 6.2.4 This may be a good business practice to encourage, but as an “ensure” statement it is too restrictive. What size is an “area?” How much variation between sizes is required? Please amend this to ‘encourage’.
- 6.3.4 The industry understands that an Agricultural Impact Assessment is being required for every ASP is based on EMRB direction, but given the size of the City, it will make more sense for the City to do an overall AIA. This will eliminate the cost and time required to regenerate the report regularly. Those developers that have provided this report with ASP Amendments recently have not felt it added value, only added time and cost to the ASP process. The industry will continue to pursue this through the EMRB, but we are formally requesting the City’s support with this initiative. It will strengthen the request if the City and the Industry can be aligned with this request to the EMRB.

Section 8

- 8.2.2 This requirement feels overly prescriptive for an MDP. The industry supports interconnectivity, but requiring it to be achieved through small block sizes seems too rigid when framed as a required statement. Please replace the word ‘require’ with ‘consider’ or ‘encourage’.
- 8.2.3. If this is to be an “ensure” statement, we expect the connections to be based on TIA results and traffic patterns. Please amend this accordingly.
- 8.4.3 a) Sidewalks should not be required on both sides of all roads. This is unnecessarily specific for an MDP. We would like to see the language of this statement softened to allow for exceptions.

Section 11

- 11.1.2: This should be revised to recognize that cash in lieu of MR land may be considered as an option in residential development, at least in limited circumstances. As currently worded, it must be land dedication only for residential

development. There may be times when cash in lieu option is a benefit to the City when trying to purchase MR elsewhere.

- 11.4.5 – Identifying this timing (30%) is too prescriptive. The ASP identifies the sites early in the development process but requiring the sites to be sub-divided and serviced at an early stage can lead to poor planning and a leap frogging scenario. We suggest removing the last sentence of this section.
- 11.4.6 – If more pedestrian and cyclist access to schools is desired, support for linear parks in the MDP will lead to achieving this goal. Currently few linear parks are being built due to the minimum width requirements.

Section 13

- 13.1.6 Although the desired 30/70 split is described as an aspirational target, we do have concerns about how this will be achieved. More specifically, we are unsure how the 40/60 split in the annexation area will be applied to individual ASPs. Will this be achieved mainly through the development of the employment lands? We want to ensure that this target will not be the expectation for each ASP. This is a concern for us across the region as we expect to see a demand for commercial land decline.

Section 14

- 14.4.6 – Although this statement has been worded as an aspiration and a statement of encouragement, it should be noted that without rapid transit being in place, the development intensification suggested may not be possible. This intensification may be more relevant in a redevelopment scenario once the rapid transit exists.
- 14.4.11. This clause needs to be reworded to reflect and encouragement, rather than a prescription. It is not always possible to gradually transition. We suggest encouraging reduced impacts on neighbors with setbacks and stepbacks.
- 14.6.8 b) We would like to see the words “greatest extent possible” softened to something more along the lines of “where it is reasonable to do so.”
- 14.6.8 k – This clause contradicts other sections of the document such as 11.1, 11.2 and 11.4.5.
- 14.6.9/14.6.10: Location of medium density/multi-unit dwellings is determined during ASP planning, and is often encouraged to be located in near proximity to schools, amenities or transit. Requiring it to be built as part of each phase, or in early phases is

overly prescriptive and does not follow sound land-use planning practice. These sites are driven by market forces and will be developed when the community amenities and infrastructure that is required to support them are in place. We want to avoid sites that remain empty and/or leap frog development.

Thank you for taking our feedback into consideration. We look forward to working together and are encouraged by the ongoing opportunity for collaboration.

Sincerely,

A handwritten signature in black ink, appearing to read 'SKM', is centered below the word 'Sincerely,'.

Susan Keating M.Eng., P.Eng.

UDI Edmonton Region