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**File #: IR-24-023, Version: 1**

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**TAMRMS#: B05**

## **INFORMATION REQUEST (IR) - BILD Edmonton Metro regarding Bylaw 18/2024**

Requested by: Mayor Heron

Date of Request: October 15, 2024

Date Response Due: November 15, 2024

Confidential Response: No

### **QUESTION**

Can we get an administrative opinion on the following proposed changes to Bylaw 18/2024 from BILD Edmonton Metro:

1. Dwelling (single detached) Lot Widths: Lot widths for single detached dwellings with zero lot-line pockets should be reduced to 20 to 22 feet (from the current recommendation of 24 feet).
2. Street-Oriented Townhouse Lot Widths: Smaller pockets on street-oriented townhouse lots should have lot widths reduced to 12 to 14 feet (from the current recommendation of 16 feet).
3. Parking Reductions for Narrow Units: The parking reduction policy for units that are 16 feet or narrower in the LUB should also apply to townhouses in Midtown, supporting diverse housing options and maximizing the use of limited urban space.
4. 18-Foot Garages: Garages with a width of 18 feet should be considered sufficient to accommodate two parking spaces.
5. 18-Foot Pocket Parking Requirements: For lots that are 18 feet wide, the requirement should be only one off-street parking space.
6. Parking Reductions Consistency: Parking ratios for all Dwelling (townhouse-complex) should be 1.5 stalls per dwelling unit. We recommend standardizing these ratios for consistency.
7. Density Bonusing for Midtown: We recommend incorporating site density bonuses in all high-density residential districts to maintain consistency throughout the bylaw.

### **RESPONSE**

#### **Introduction**

City Administration has provided a detailed response to the majority of these requested changes submitted by BILD Edmonton Metro in June 2024, after BILD submitted feedback during the draft LUB comment period. The one new request, regarding fee simple products in the Midtown district, was not included in the May 2024 letter.

However, it should be noted that while Council can direct Administration to conduct changes, these requests, generated by industry input, are best initiated by the developer/applicants themselves.

As development pays for development, this direction is the standard process for land use bylaw amendments in St. Albert, as the applicant will determine what regulation changes they require,

provide supporting rationale, and provide the required amendment fee for the City to evaluate their proposal.

It also must be noted that proposed changes to the regulations would require public input. As some of the changes are for site specific area (like Midtown), specific and targeted public participation activities would be required, in accordance with the *Public Participation Guidelines for Planning and Development Applications*. It's recommended that public consultation, and its associated costs, be borne by the applicant.

Administration recommends this approach for the following reasons:

1. The impacted party is best positioned to demonstrate the need for the change and provide the exact wording for the regulation.
2. Administration can conduct a comprehensive review of the change. If Administration drafts changes and recommends them to Council, it could create a conflict of interest.
3. Administration would be "representing" the regulation change and assuming the rationale for it. This can be time-consuming, lead to back-and-forth discussions, potential misunderstandings, and lost revenue for the City. Therefore, this is often not the most efficient way to process developer-specific requests.

## **Item 1: Dwelling (Single Detached) Lot Widths**

*Lot widths for single detached dwellings with zero lot-line pockets should be reduced to 20 to 22 feet (from the current recommendation of 24 feet).*

### **Background**

Land Use Bylaw 9/2005 had a single detached zero lot line lot width of 8.9 m (29.2 ft) for an interior lot, and 12.2 m (40.0 ft) on a corner lot, for the RX District. These were carried over to the SLR District in LUB 18/2024.

In the past, LUB 9/2005 had a lot width distribution regulation, which required that detached lots in a neighbourhood vary in size. Some lots would need to be larger (14.5 m in width or greater), medium (12.2 m in width to less than 14.5 m in width), small (11.5 m to 12.2 m in width), and extra small (10.0 m to less than 11.5 m in width).

In 2018 the RX and RXL districts were proposed, which shrunk single-detached lot widths to 8.6 m (28.2 ft) for laned homes, and kept front drive homes at 10.0 m (32.8 ft) wide.

Then in 2020 zero lot-line single detached homes were proposed, which lessened single-detached lot widths to 7.7 m (25.3 ft) for laned homes, and 8.9 m (29.2 ft) for front drive homes.

In 2022 the lot width distribution regulations were removed, and now there are no restrictions on the number of small lots that can be developed in a neighbourhood.

This proposal impacts the Small Lot Residential (SLR) District zero lot line width within LUB 18/2024. These products will be housing units with front vehicle access to a street.

A 20-foot wide single detached home developed with a zero lot-line has a lot width of 7.6 m (24.9 ft), for an interior lot, and either 9.1 m (29.8 ft) or 10.6 m (34.8 ft) for a corner lot (depending on whether

the easement is placed on the lot or the adjacent lot). A 22-foot wide single detached home developed with a zero lot-line, has a lot width of 8.2 m (26.9 ft), for an interior lot, and either 9.7 m (31.8 ft) or 11.2 m (36.8 ft) for a corner lot (depending on whether the easement is placed on the lot or the adjacent lot). The proposed lots are shown on Figure 1 and Figure 2. Please note that these are drawn with a 30 m deep lot, as currently approved in the LUB.

Figure 1: 20 ft Building Pocket Zero Lot-Line Block Face

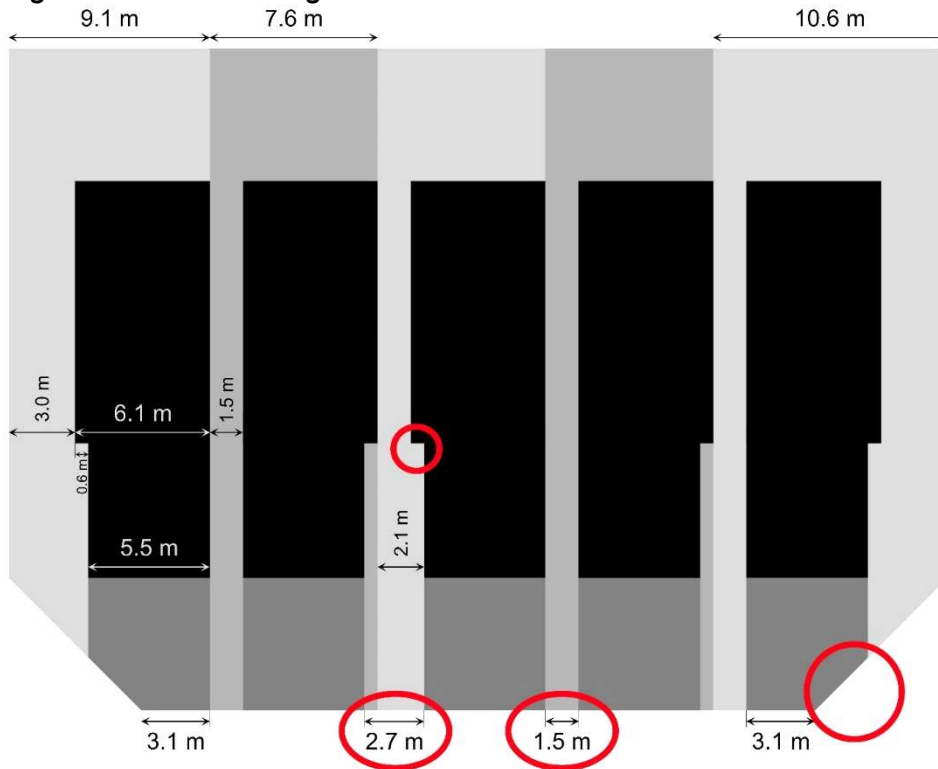
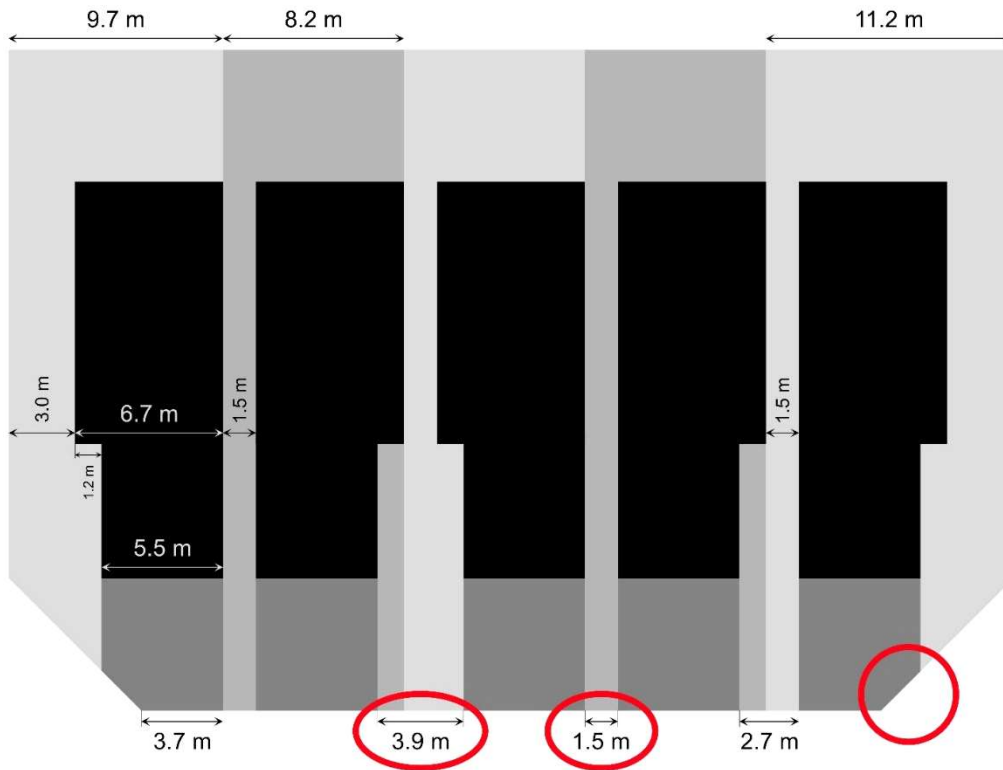


Figure 2: 22 ft Building Pocket Zero Lot-Line Block Face



### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Recessed entrances, with garages dominating the streetscape

With the 20-foot building pocket, as shown in Figure 1, the difference between the width of the house and the width of the garage is about 0.6 m (2.0 ft) (if building an 18 ft garage). That is not enough width to feature a full front door, which typically requires at least 1.2 m (4.0 ft). As shown on Figure 3, Figure 4, and Figure 5, the front entry on these products will need to be recessed or partially recessed, depending on the size of the garage. Garages and driveways will dominate the front streetscape. The resultant built environment is anticipated to go against the first principle of Crime Prevention Through Environmental Design (CPTED), which is to provide natural surveillance.

*Figure 3: Partially Recessed Entrance in Crystallina Nera*



*Figure 4: Streetscape in Crystallina Nera, Edmonton*



Figure 5: Rendering of a Partially Recessed Entrance on a Single-Detached Home



Please note, with the 22.0 ft building pocket, there will be room to feature a full front door (if a 5.5 m [18.0 ft] wide garage is constructed).



### Negative Impacts to the Boulevard

As shown on Figure 1, the distance between the driveways is approximately 1.5 m (4.9 ft) or 2.7 m (8.9 ft) for lots with a 6.1 m (20 ft) wide home. As shown on Figure 2, the distance between the driveways is approximately 1.5 m (4.9 ft) or 3.9 m (12.8 ft) for lots with a 6.7 m (22 ft) wide home.

With a reduced front drive lot width, there is less room street furniture, including lights, hydrants, and power boxes. There is less room for boulevard trees. Because the spaces between the driveways would be narrower than on larger lots, there would be less room to support boulevard trees, and less variety of tree species that can thrive in that small of a space.

On-street parking will be eliminated, at either building pocket size.

### Corner Lot Driveway Conflicts

On a corner lot, there would be conflict between the driveway and the corner cut. Typically, our streets have corner cuts, we looked at a standard 6.0 m corner cut on Figure 1 and Figure 2. Corner cuts are used to create a visibility triangle for drivers at intersections. The corner cut would impact the driveway on a corner lot significantly. The homeowner would be left with a 3.1 m (10.2 ft) area to enter and exit their lot, instead of the regular 5.5 m (18.0 ft) of driveway width. The driveway would need to taper significantly, to avoid being placed in the corner cut.

### Statutory Plan Conformance

While only a few regulations will be impacted, including the lot width, there will be a significantly different streetscape that will be built (compared with the current building pocket of 24.0 feet).

As such, when evaluating the regulations' impact on the streetscape, Administration contends that the proposed changes would not align with several policies within *Flourish* Municipal Development Plan. Specifically, policies within Sections 12.2 Streetscapes, 12.3 Built Form and Site Planning, and 12.4 Accessibility and Comfort aim to:

- Create safe, comfortable, and inviting streets designed for people.
- Facilitate development that enhances the character of its surroundings and the city, contributing to attractive, enduring, and memorable places.
- Design St. Albert to be accessible and inviting to everyone in all seasons.

By enabling a streetscape where the front door is obscured from the street, the garage becomes the focal point of the public realm, and there's a lack of space for street furniture infrastructure and prized boulevard trees, the proposed changes would negatively impact safety, accessibility, and the overall aesthetics and environmental footprint of the neighbourhood.

Administration contends that if the developer/builder desires a 20-foot building pocket, the Land Use Bylaw already provides this opportunity through the Laned Lot Residential (LLR) District. This district allows for reduced lot widths, ensuring adequate on-street parking, a high-quality streetscape (including boulevard trees and street furniture), and maintained safety and accessibility, as the front door remains fully visible from the street. Overall, if smaller lot sizes are required, Administration recommends that it be constructed in a laned product, and example of which is shown in Figure 6.

*Figure 6: Small Lot Laned Homes in Crystallina Nera*

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## Item 2: Street-Oriented Townhouse Lot Widths:

*Smaller pockets on street-oriented townhouse lots should have lot widths reduced to 12 to 14 feet (from the current recommendation of 16 feet).*

### Background

Fee simple townhousing is called a dwelling (townhouse - single) in LUB 18/2024. This is a use in the Laned Lot Residential (LLR) District only. Some fee simple townhomes have been grandfathered in the MDR District (so as not to lose development rights), however we don't anticipate new areas of fee simple townhousing using the MDR District.

Land Use Bylaw 9/2005 had a fee simple townhouse lot width of 5.5 m (18.0 ft) for an interior unit. Land Use Bylaw 18/2024 reduced that by 0.6 m (2.0 ft), to allow lot widths of 4.9 m (16.0 ft) for fee simple townhouse interior units.

Industry proposed that lot widths be reduced to either 4.3 m (14.1 ft), or 3.7 m (12.1 ft) for interior units. It should be noted that while this width is not enabled as a "dwelling (townhouse - single)", the Land Use Bylaw does enable these reduced widths through "dwelling (townhouse - complex)".

### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Taller Structures with Encumbered Layouts

If the interior townhouse lots are capped at the existing 55% lot coverage, it's estimated that:

- A 3.7 m (12.1 ft) wide unit would be approximately 67 sq m (720 sq ft), if constructed as a two storey dwelling, as shown in Figure 7. This does not meet our minimum dwelling size requirement of 75 sq m (807 sq ft) in the LLR District, as per LUB 9/2005 section 5.4(8)(a).
- A 4.3 m (14.1 ft) wide unit would be approximately 79 sq m (850 sq ft), as shown in Figure 8.

If lot coverages were capped at 55%, to achieve more living space, buildings would have to add an extra storey and be constructed taller.

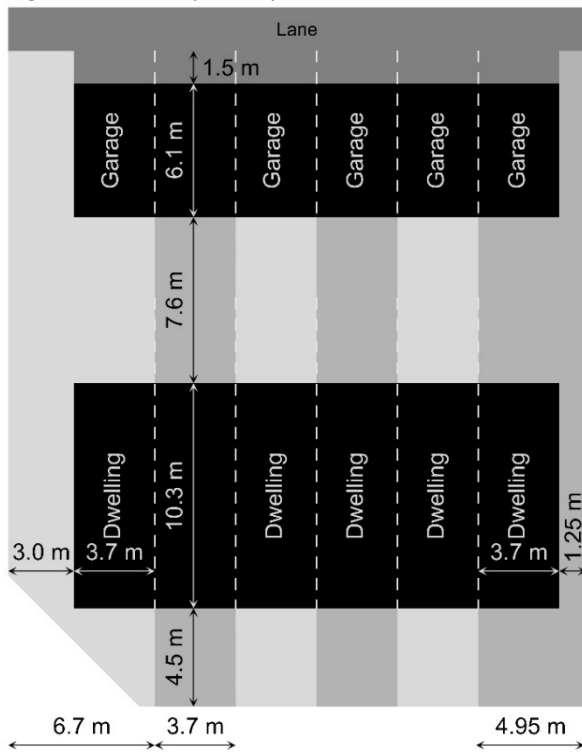


Furthermore, this means that the floorplans of these smaller units will be encumbered by staircases. A staircase is approximately 0.9 m (3.0 ft) wide. This leaves about:

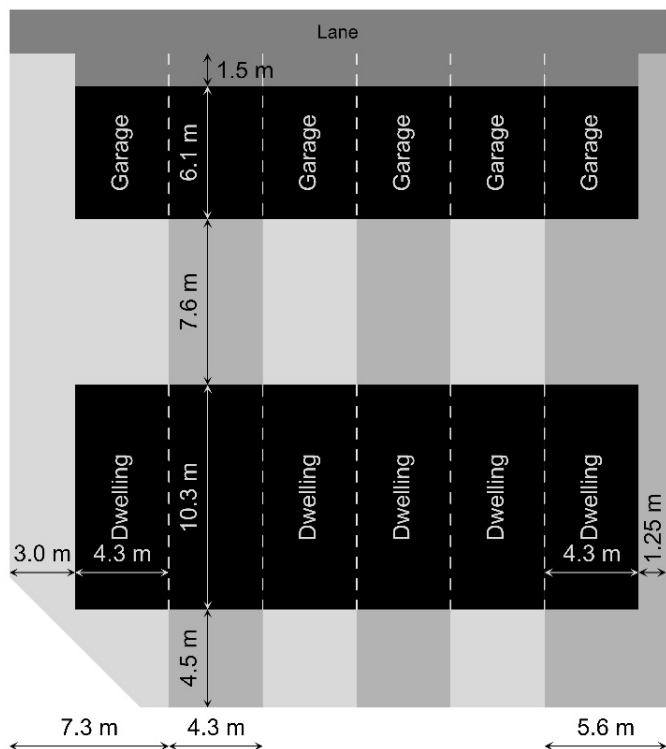
- 2.8 m (9.2 ft) of home width for some portions of the 3.7 m (12.1 ft) wide townhouse unit, and
- 3.4 m (11.2 ft) of home width for some portions of the 4.3 m (14.1 ft) wide townhouse unit.

As a contrast, a two-bedroom apartment that is 75.0 m<sup>2</sup> (approx. 807 ft<sup>2</sup>) does not have the staircase as an encumbrance and offers more living area all on one level, and potentially larger room sizes than some of the smaller townhouse products.

*Figure 7: 3.7 m (12.1 ft) Wide Townhouse at 55% Lot Coverage*



*Figure 8: 4.3 m (14.1 ft) Wide Townhouse at 55% Lot Coverage*



### Lot Coverage Increases & Lack of Permeable Surfaces

To alleviate the concerns over the dwelling size, and keep the building height under 11.0 m (36.1 ft), it's anticipated that the development industry would ask for increased lot coverages. Depending on the scale of the lot coverage increases requested, the units might not meet the building separation distance requirement (1.5 m [4.9 ft] between the house and detached garage), or the rear yard setback of 10.0 m (32.8 ft), when there isn't an attached garage.

Additionally, most of the lot would either be covered with building or paved. There are concerns that the lack of permeable surface will contribute to higher rates of runoff that will need to be handled by the storm water system.

### Lack of Amenity Area

In wider townhousing units, there is more opportunity for a yard, and amenity space. The smaller townhouse units must cover more of the lot in order to get adequate square footage for living spaces. This leaves very little private amenity area, as lot coverages are increased.

Please note that front yards are typically prohibited from having items that families may use, such as trampolines, play structures, air conditioning units, and storage sheds. All those items would need to be placed in the rear yard.

### Density & Housing Diversity

There is concern that shrinking lot sizes are being used to achieve required density targets, but without regard for housing diversity, which is a key goal of section 7.1 of *Flourish* MDP.

### Condo Units

Administration will note that it is already possible to build narrower townhouse units in a condominium format. There are advantages with providing smaller townhousing units in a condo complex, which include:

- Condo complexes have amenity area requirements for livability. The land use bylaw requires both private and common amenity area for townhouse complexes. In some cases this is provided in a little tot lot, or dog run area, or shared garden, or seating area. It could also be internal, within a common room for example.
- Another advantage is the visitor parking for guests. Condo complexes have mandatory visitor parking ratio - so

guests have an area to park.

### Item 3: Parking Reductions for Narrow Units

*The parking reduction policy for units that are 16 feet or narrower in the LUB should also apply to townhouses in Midtown, supporting diverse housing options and maximizing the use of limited urban space.*

#### Background

Midtown is part of the South Riel Area Structure Plan. Midtown was developed as a separate district in LUB 9/2005, and was carried over into LUB 18/2024. The purpose of the Midtown District, in both LUB 9/2005, and LUB 18/2024 specifically identify that: *“The district shall be developed as bare land or conventional condominium.”*

The current areas of Midtown that are being developed have been registered with land titles as condominium Plan 212 2029.

As this proposed regulation benefits the developer within the Midtown Land Use District, it is recommended that the applicant initiate the standard amendment process (described earlier in the Information Request) to pursue these changes.

#### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

##### District Purpose is Not Fee Simple Homes

The dwelling (townhouse - single) regulations in LUB 18/2024 were developed to accommodate fee simple townhouse units that are registered with land titles on their own individual lot. There is no condominium corporation that oversees the block of townhouses, each owner is responsible for their own portion of the building, and a party wall agreement registered on title handles the shared wall between the units.

Dwelling (townhouse - single) is not a listed use in any of Areas A, B, or C of the Midtown District, because the overall purpose of the district was to be developed as bare land or conventional condominium. Therefore, administration did not include parking regulations for a product that was not a listed use.

##### Significant Scope of Change

If the purpose of Midtown is to change to include fee-simple products, then it would impact several sections of regulations. It would not only be the parking section of the LUB that would need to be amended, but the use lists, the purpose of the district, and townhouse regulations added in for fee simple units. This would change the entirety of the district.

It would also require that the South Riel Area Structure Plan be amended, as the plan notes condominium products are expected for residential land uses.

There is a large scope to this work. If the applicant does all the preliminary work, and then applies for an amendment, then City staff only need to evaluate the proposal. If City staff are directed to undertake the work, they also need to do the preliminary research and consultation.

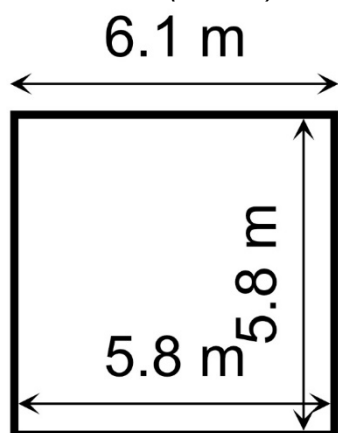
### Item 4: 18-Foot Garages as Two Parking Spaces

*Garages with a width of 18 feet should be considered sufficient to accommodate two parking spaces.*

#### Background

Land Use Bylaw 9/2005 required a minimum clear interior garage dimension of 5.8 m (19.0 ft) by 5.8 m (19.0 ft). This regulation was carried over into Land Use Bylaw 18/2024, as section 4.4(1)(b). The minimum garage dimension was first approved by Council ~2017. It was brought forward by Administration due development industry request (in lieu of a minimum driveway pad to have a minimum garage dimension), and due to new-owner complaints that the homes they had purchased did not have garages large enough for two vehicles. Previously, garage parking was not counted as part of minimum required parking, while minimum off-street parking on the driveway was required. The amendment removed the driveway requirement, in exchange for minimum functional garage parking. A diagram showing the approximate dimensions can be seen as Figure 9, and the approximate interior dimension per car can be seen in Figure 10. A diagram showing the requested garage can be seen as Figure 11, and the approximate interior dimensions can be seen as Figure 12.

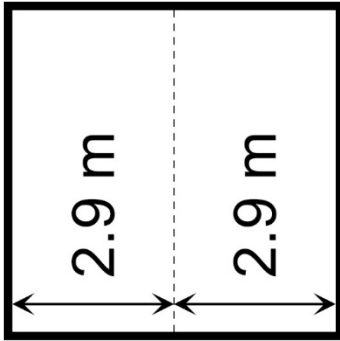
Figure 9: 6.1 m (20.0 ft) Current Garage Dimensions



6.1 m (20 ft) wide  
(Exterior Dimension)

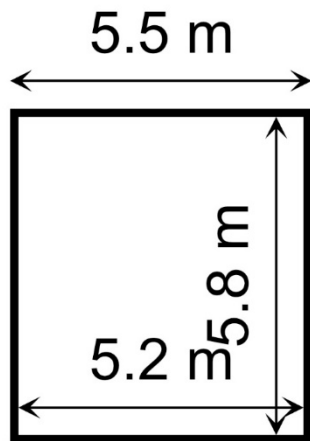
5.8 m (19 ft) wide  
(Interior Dimension)

Figure 10: 6.1 m (20.0 ft) Current Garage Space per Vehicle



2.9 m (9.5 ft)  
per car

Figure 11: 5.5 m (18.0 ft) Proposed Garage Dimensions

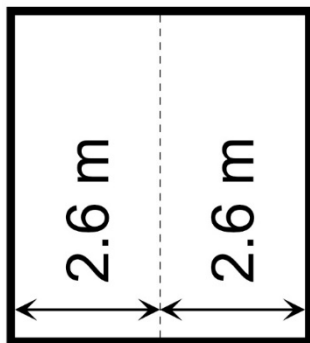


5.5 m (18 ft) wide  
(Exterior Dimension)

5.2 m (17 ft) wide  
(Interior Dimension)

Figure 12: 5.5 m (18.0 ft) Proposed Garage Space per Vehicle





2.6 m (8.5 ft)  
per car

### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Parking Stall Size

An unobstructed perpendicular parking stall currently requires a minimum dimension of 2.6 m (8.5 ft) by 5.8 m (19.0 ft). In this case, the intent was the stall would be unencumbered, and not have any obstructions that would block the door swing of the vehicle. This would be the dimension seen in a typical surface parking lot. In these cases, the door would swing over the yellow painted line demarcating the stall, as shown in Figure 13.

The requested garage, as shown in Figure 12, only has 2.6 m (8.5 ft) of width per vehicle. The addition of walls adds a limitation to how effectively this distance can function, as there is less room per vehicle.

#### Issues with Functionality

There are pictures showing two vehicles parked in a 5.5 m (18.0 ft) wide garage, see Figure 14. Administration observed the scenario in Figure 14 and noted:

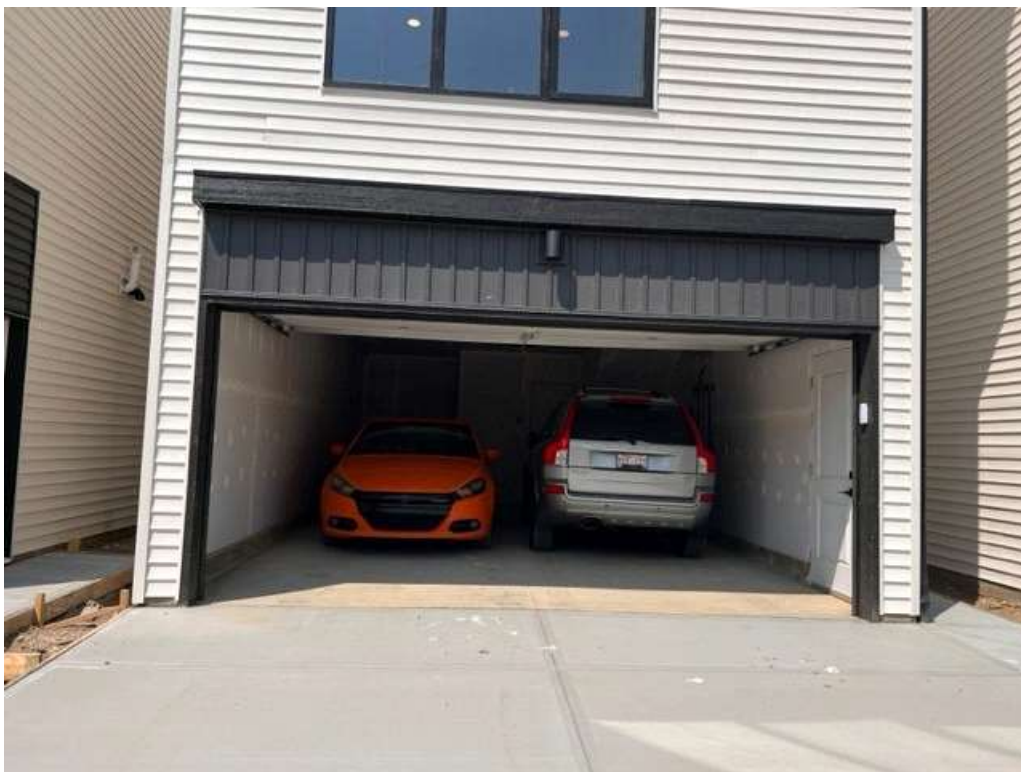
1. The narrower garage configuration generally requires one car to back in, and one car to pull in to allow communal space to enter and exit the vehicles.
2. The sideview mirrors cause an obstruction to entering and exiting the garage, as they protrude from the vehicle, and in some cases, can't be folded in.
3. New vehicle sales in Alberta are primarily comprised of mid-sized SUVs or pickup trucks (at rates of 70% or greater of new vehicle sales). With St. Albert having more vehicles per capita than the Alberta average, there is concern that the scenario illustrated in Figure 14 would not work with two mid-sized SUVs.
4. There are concerns that the actual functionality of the garage for a family could be reduced. For example, if a family had two vehicles, if they had items such as a child carrier, they might not be able to open the door wide enough to take the child carrier in and out of the vehicle, because of the lessened interior room. The individual would have to unload their child in the driveway, before parking the vehicle in the garage (if they wanted to fit two vehicles in). Basic tasks such as unloading groceries may also be impacted, as the vehicle door might not be able to open wide enough in the reduced parking space.

Figure 13: Vehicle Door Swinging Over the Yellow Line in an Unobstructed Parking Stall



*Figure 14: Two Vehicles in an 18-foot-wide Garage*

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## Item 5: 18-Foot Pocket Parking Requirements

*For lots that are 18 feet wide, the requirement should be only one off-street parking space.*

### Background

Land Use Bylaw 9/2005 required two parking stalls for the majority of low-density residential homes, and that was mostly carried over to LUB 18/2024, with the exception of parking for smaller townhouse units.

### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Rate of Vehicle Ownership

The Government of Alberta releases data on motor vehicle registrations, and as of March 31, 2024, St. Alberta had 55,593 registered motorized vehicles. The preliminary 2024 census data indicated St. Albert had 29,549 dwellings. 55,593 vehicles divided by 29,549 dwellings is approximately 1.9 motorized vehicles per dwelling.

As multiple vehicle ownership tends to increase with income, it was chosen to reduce parking for lower cost housing products (such as apartments, and smaller townhousing units), and retain the 2-stall minimum for higher cost housing products (such as single-detached, semi-detached and duplex homes).

#### Other Parking Reductions

Single detached, semi-detached homes with a smaller garage can still have secondary suites, including garage suites, garden suites, and internal suites. Parking for these suites has been reduced to zero or 1 stall, depending on the number

of suites on the lot. Yet, occupants of suites can still own motor vehicles and will require a parking space.

If parking is reduced even on lots that have a primary dwelling unit and a suite, there is likelihood that the street will have to take the overflow parking from the suite, and possibly the primary dwelling unit as well.

### Consequences of Change

New neighbourhoods developed with small lots might be deficient in on-site parking, and may have significant spillover onto the street. If on-street parking is not available, due to shrinking lot sizes, there could be an increase in enforcement issues, as drivers seek to park close to their dwelling, but end up blocking other driveways.

Reducing the number of parking spaces required per lot will mean no driveway would be provided on laned products. While this will allow for more backyard area, it could contribute to parking deficiencies.

## Item 6: Parking Reduction Consistency

*Parking Reductions Consistency: Parking ratios for all Dwelling (townhouse-complex) should be 1.5 stalls per dwelling unit. We recommend standardizing these ratios for consistency.*

### Background

The Midtown District includes its own parking section, which was carried over from LUB 9/2005 to LUB 18/2024. Some parking reductions were provided, however dwelling (townhouse - complex) parking was not reduced.

As this proposed regulation benefits the developer within the Midtown Land Use District, it is recommended that the applicant initiate the standard amendment process (described earlier in the Information Request) to pursue these changes.

### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Unique Context

The Midtown neighbourhood is unique, and site specifically drafted for this one area of the city, similar to a direct control project. Administration has not proposed reductions to dwelling (townhouse - complex) parking in the Midtown District.

The entirety of the Midtown neighbourhood is designed as a condominium and is proposed to be 10.4 ha (about 26 acres) in size. At this time, other areas in the city have townhouse complexes that vary in size but are typically under 5 ha (about 12 acres) in size.

Typically, condo complexes are one component of a neighborhood. In this case the entirety of the Midtown neighborhood is a condominium. If there are parking issues, there will not be the same opportunity to overflow park in other parts of the neighbourhood, like there are in other neighborhoods within the City.

#### Internal Road System

Midtown is being developed as a condominium, as per the purpose of the district. The South Riel ASP indicates that developments may include private roadways. Private roadways do not need to meet the Municipal Engineering Standards. The roads shown as "Unnamed" on Figure 15 are private roads.

*Figure 15: Internal Road Network in Midtown*

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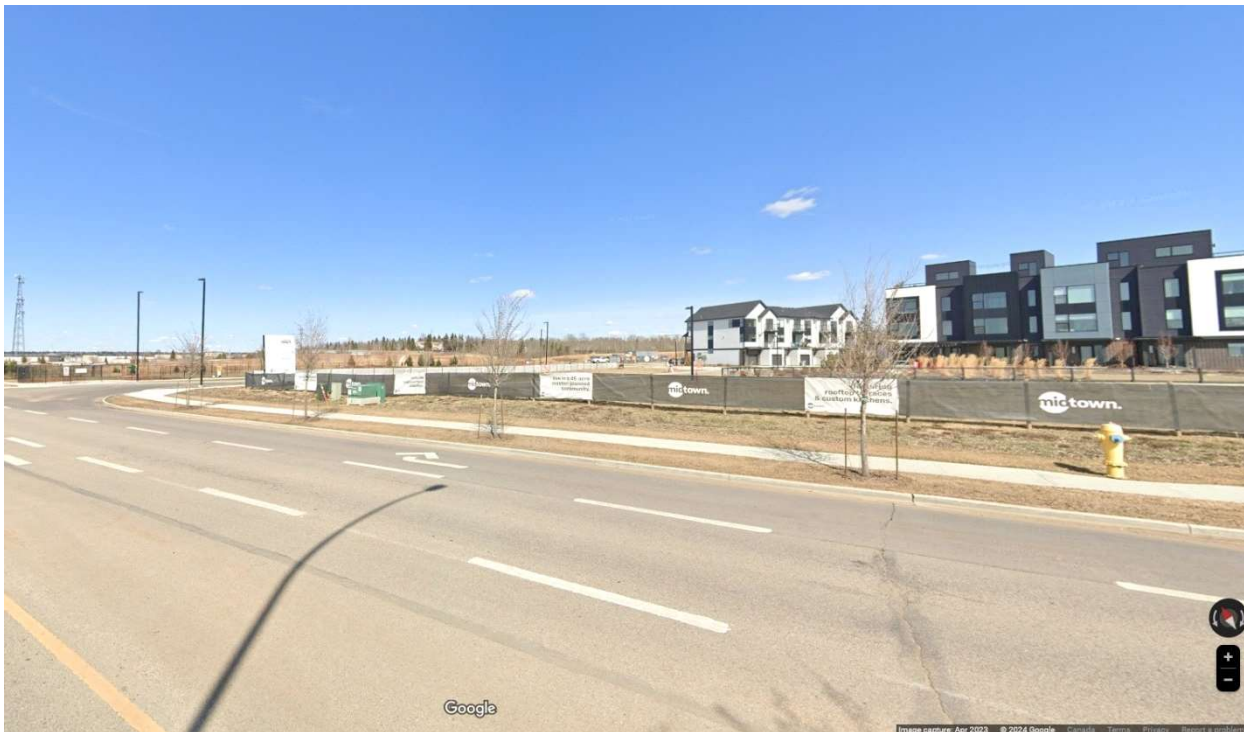
### Lack of On-Street Parking in Area

On the city owned streets that flank the Midtown neighborhood, there is a lack of on-street parking. Riel Drive does not allow on-street parking in this area, because there is a turning bay to get into the Midtown development, as shown on Figure 16. Further north along Riel Drive there are two bus stops, and two fire hydrants (as the road approaches the intersection with Levesseur) that would prevent on-street parking. There is also another intersection with a future road that will be constructed, and there won't be on-street parking in that area as well.

In addition, Levesseur Road, or LeClair Way also do not offer on-street parking in this area. Currently, Rondeau Drive would be the only public city street that can accommodate parking overflow for existing residents.

Figure 16: Turning Bay on Riel Drive





## Item 7: Density Bonusing for Midtown

*Density Bonusing for Midtown: We recommend incorporating site density bonuses in all high-density residential districts to maintain consistency throughout the bylaw.*

### Background

The Midtown neighbourhood is included in the South Riel Area Structure Plan, which was originally approved in 2015. It has three areas - Residential Area A, Residential Area B, and Residential Area C. The proposed density is 40 du/ha for Area A, 60 du/h for Area B, and 186 du/ha for Area C as per the ASP.

As this proposed regulation benefits the developer within the Midtown Land Use District, it is recommended that the applicant initiate the standard amendment process (described earlier in the Information Request) to pursue these changes.

### Administrative Rationale

Administration does not recommend implementing this change request for these reasons:

#### Want to Ensure Servicing can Handle Further Density

The average density in new neighborhoods in St. Albert is 40 du/ha. The proposed overall density in the Midtown district is 80 du/ha. Midtown is twice the necessary density target as set out by the EMRB and the MDP.

Administration's concerns are:

- How much more density is proposed in this area?

- There seems to be a conflict between requests, as an item in IR-24-025 asks to lower the density in Midtown.

### Public Consultation

If there are significant proposals to increase density in this area, residents of the existing neighborhood should be consulted.

### Why Only Area C?

The Medium Density Residential (MDR) District also has density bonusing provisions, as per LUB 18/2024 section 5.6(8). The density range on the MDR district is 40 to 100 du/ha. With density bonusing, a development may go up to 125 du/nha.

If the developer is requesting that density bonusing applied, it should be applied equally across all three of the Areas A, B, and C, as the density ranges for Areas A and B are consistent with the MDR district, unless rationale is provided otherwise.

### Consequences of Change

In all cases, the applicant will have to confirm that they have sufficient servicing capacity prior to proceeding with development. Using the density bonusing will be at the applicant's own risk.

## Summary

Proceeding with these amendments as Administrative-led projects will impact current priorities within the Planning and Development Branches. Prioritizing this request would necessitate a reprioritization of effort and a delay of other projects, likely the Infill Strategy and interactive Land Use Bylaw implementation.

Additionally, if City staff were to develop the new regulations instead of the applicant's consultants, the City would forego standard fees for such requests. Based on 2025 fees, as shown in Table 1, this revenue loss is estimated at approximately \$57,735.

*Table 1: Estimated Revenue Loss*

<b>Item</b>	<b>2025 Master Rates Fee</b>
Land Use Bylaw Amendment for Item 1	\$7,365.00
Municipal Development Plan Amendment for Item 1	\$6,180.00
Land Use Bylaw Amendment for Item 2	\$7,365.00
Land Use Bylaw Amendment for Item 3	\$7,365.00
Land Use Bylaw Amendment for Item 4	\$7,365.00
Land Use Bylaw Amendment for Item 5	\$7,365.00
Land Use Bylaw Amendment for Item 6	\$7,365.00
Land Use Bylaw Amendment for Item 7	\$7,365.00
<b>Total</b>	<b>\$57,735.00</b>

Report Date: November 15, 2024  
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