

ADDITIONAL PUBLIC INPUT



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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 an 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 'SK', is centered on a light gray rectangular background.

Susan Keating M.Eng., P.Eng.

UDI Edmonton Region

(submitted via email to legislative@stalbert.ca.)

Flourish MDP Public Hearing - Apr 19, 2021

I would like to thank the Long-Term Planning team for their work on this important project. Three years of public consultation and research has produced a much better MDP for the City of St Albert.

The following are my views regarding the *Flourish* MDP and the possible changes that might be considered following the first day of the Public Hearing.

Issues raised by BLESS

I am not a member of BLESS but my concerns about preserving parkland and natural areas for wildlife are very similar to those stated by BLESS.

Once the sensitive parkland and wildlife habitat is lost to asphalt, concrete and steel, it is permanently lost. It is as simple as that.

Urban Development Institute's Letter

The [Urban Development Institute's letter](#) is asking for too much flexibility, and also at the very last minute.

They said, "***they need to ensure that the MDP offers flexibility in order to evolve with the market forces***".

My response - The MDP should be the playbook based on a clear vision. It should not be trying to respond to the ebb and flow of market forces to serve the wishes of developers. Any changes to the MDP should be gradual and only completed through careful due diligence.

The UDI also said that, "***Across the region we expect to see demand for commercial land to decline***".

My Response - That is not a good reason to soften the wording for the City's aspirational tax base target of 30% commercial and 70% residential. A well designed MDP, based on sound thinking and certainty, will create the conditions to encourage commercial development. By the way, investors do not like uncertainty, and that applies to private homeowners.

How to draft a Municipal Development Plan

I believe that ***Flourish is only effective as a plan if it has clarity, understandable rules, and policies that can be trusted over time.***

For example, the MDP points to St Albert Trail and Downtown as the proper locations for medium to high density development. It does not point to building more high-rises along the Sturgeon River valley or adjacent to single family residential developments.

If a developer or landowner wants to apply for a change to their property's zoning, they should have an overwhelming and compelling reason to ask for the change. The developer bought the property knowing the existing zoning and they are not entitled to see it changed simply to generate higher profits.

A clear MDP is like a traffic light-controlled intersection on St Albert Trail. When you enter the intersection, you trust that the traffic light sequence will operate as designed, and you expect the opposing drivers to obey the traffic signal (even if they would rather ignore it if they can).

In comparison, if someone buys a home, they should be able to depend on the vision in the MDP and the existing ASP and LUB zoning surrounding their property.

I also referred to the **Guidebook for Preparing a Municipal Development Plan**. This a document that the Province of Alberta released in March 2018 to help guide municipalities in the drafting of an MDP.

I found a couple interesting sections :

a/ The Topic and Policy section says each section starts with Goal Statements aligned to the Vision & Principles. Objectives are added and followed by Policy Statements enabled by terms like "shall", "should" or "may" statements.

✓ In other words, there is a structure to be followed, that requires effective language.

b/ Under the Community Members section it says, "***Residents, property owners and business owners should be able to consult the MDP and determine what could be happening around them and their property in the long term***".

✓ This quote directly supports my earlier statement that the community should be able to trust the MDP and related ASP and LUBs.

These quotes from the province's Guidelines show how the provincial guidelines state the importance of building a solid and dependable plan.

I believe the Flourish MDP wording should not be softened :

- The MDP needs to serve as a dependable long-term foundation, built on clarity, for the public, City Administration, Council and developers.
- If the wording is softened, it will be to meet the wishes of only one of those stakeholders – that being developers.
- The City should adhere to the principles of how an MDP should be constructed so the rules can be understood by all parties and consistently applied.

Concluding Comments

Therefore, **I disagree with suggestion that the MDP needs to be changed to be more nimble and flexible.** If Council moves in that direction, the plan ceases to be a plan and starts to become a vague guideline and fails to meet the Provincial Government’s expectations.

In the first day of the Public Hearing :

- Councilor Broadhead said, “The clearly stated words are there to create the standard”.
- Kristina Peter said, “The terms of reference such as the word “ensure” are required to make the plan work”.

Both of these statements demonstrate how a shift towards more flexibility, for the sole benefit of developers, weakens and undermines the intent, vision and policies in Flourish.

Flourish should reflect the 3 years of public consultation and support the following issues :

- The public should be able to trust that the MDP policies will be followed.
- Administration and Council should adhere to urban planning principles like “gentle densification” and “missing middle” transition design near established residential areas of the City.
- It should mean that no more high-rise towers are built beside Sturgeon River or in close proximity to single family dwelling neighbourhoods.
- And larger higher density structures such as high-rise condos and apartments should be in downtown St Albert or along St Albert Trail, as per the policies in Flourish.

In conclusion, softening the wording only works to the advantage of developers and no doubt it will be to the disadvantage of the impacted neighbourhoods and community.

Please remember that developers are not the only ones who invest in the City. There are tens of thousands of homeowners who invest their life savings into their homes, and make long term commitments to live, work, raise their families, and retire in this community. They need certainty for their investments as well.

I hope my feedback will play a factor in your decision making.

Thank you,

Grant Miner

Address St Albert Council – Bylaw 20/2020 Municipal Development Plan – *flourish* – April 19, 2021

Mayor Heron and Councillors

I am speaking today in favor of Bylaw 20/2020, as amended, to provide a new Municipal Development Plan

The Municipal Development Plan is the backbone to city planning and development and yet recent developments have suggested that it lacks a strong advocate.

As set out in the Municipal Government Act, the MDP should be updated on the average every 5-10 years. St Albert's current MDP, City Plan, was completed in 2007. This may explain why more recently there is rising acrimony over development proposals in St Albert.

I value good planning and progressive development. Consequently it is disappointing to see residents in new communities like Riverside and mature ones like Oakmont and Erin Ridge, having to challenge Council on proposed changes to the MDP after they have entrusted this and previous Councils to honor the intents of the MDP. The residents coming forward have made in some cases substantial social and financial investments to locate themselves in these communities only to be confronted with development proposals that run counter to what is outlined in the MDP.

The MDP should be a document that residents can rely on to build and develop in St Albert – a promise made is a promise kept. The MDP is a regulatory document worthy of safeguarding.

Provisions exist for landowners to approach Council for change in land use zoning. The Municipal Government Act makes provision for this regulatory duty and hence the role of the Public Hearings. These public hearings should be an opportunity for Council as decision makers to weigh the community support and design for change.

Embodied in the current proposed MDP is provision of “multi use nodes”. Examination of the public record from the consultations that formed the basis of the proposed MDP shows resident and business support for multi use nodes with caveats. These nodes were supported on the basis that they complemented the communities they were be situated in - scope and scale were important. Clearly the input desired smaller, community based gathering places inclusive of small business enterprises. The feedback also stressed the need to avoid the placement of large buildings in these nodes and especially when proposed in proximity to the river.

In closing, the MDP is the backbone of good city growth. Stewardship of that plan falls to Administration to strongly advocate for adherence to the plan in the face of inevitable requests to change land use zoning. It is incumbent on Council to seriously reconsider any change to the

MDP especially when it considers proposals to change land uses in mature communities like Oakmont and Erin Ridge.

Ken Crutchfield
1 Wakefield Place
St Albert, T8N 3K7

April 11, 2021

* LEGACY

Al Henry
President BLESS
Big Lake Environment Support Society
St Albert, Ab T8N 1R9
Canada

Good Afternoon Mayor and Councillors

I am here to speak to the Economic Benefits of Lois Hole Provincial Park. I have attached a copy of an e mail from Miles Constable Treasurer BLESS, who investigated the benefits of Parks with the Environmental, the Social and the Economic Benefits. The Websites are listed for your further investigation.

St Albert is only one of two Western Canadian Cities with a Major Provincial Park on it's boundaries. It is within walking distance of a million people and this undiscovered asset has largely been ignored as major economic stimulus for St Albert.

Parks attract a significant number of tourists, contributing to local businesses and economies. Tourists have an increased interest in the outdoors and nature-based activities, and they are willing to travel to pursue special interests and experiences (Active Living – Go for Green, 1995). Not only do Parks attract new businesses, but they also provide job opportunities and life-style benefits that hold residents in the area, resulting in dynamic changes that support sustainable local economies. In addition, parks generate part-time and full-time employment in the respective areas through construction workers and laborers, and ongoing maintenance of the trails requires further employment. According to a report by the U.S. National Parks Service, increases in property values range from 5% to 32%. Increases are particularly noted near greenways that highlight open space rather than highly developed facilities

Lois Hole Provincial Park is the 5th most important Birding Area in the Province. It a major stop over for Migratory Birds flying north conversely in the Fall flying south. It has been designated an IBA with only 200 other locations world wide having this designation. Thousands and thousands of birds visited the Lake this year and hundreds of Birders and Nature lovers as well.

Provincial Parks generate a province wide impact of \$1.2 Billion and more than 23,480 person years of employment. Fish Creek in Calgary brings in millions in grants and donations and it is a major attraction for downtown Calgary with spin off tourist dollars in the millions. With a little effort LHPP will produce way more revenue and spin off revenue from tourism than Warehouses could ever dream of producing.

The City is now in the midst of some major changes for LHPP. I would hate to see this unique gem destroyed for the short term gain of a few development dollars when this opportunity for LHPP is sitting there waiting for some Economic Planning from St Albert. Thank you.



Al Henry
View Office Technology Inc
42 Airport Road NW
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780 702 2939 Phone

Subject: Economic benefits of parks

From: Miles Constable <[REDACTED]>

Date: 3/16/2021, 4:45 PM

To: Alan Henry <alanhenry@viewofficetech.com>

<https://www.albertaparks.ca/albertaparksca/management-land-use/building-the-parks-system/benefits-of-parks/>

Environmental Benefits

Alberta's parks protect over 27,000 square kilometres of representative and special landscapes. These spaces protect biodiversity and provide habitat for common, vulnerable and endangered species. They protect many features and provide ecosystem services that benefit all living organisms.

There is a growing recognition of the importance of ecosystem services to society's health, social, cultural and economic needs. Humans benefit from many resources and processes that are supplied by natural ecosystems - collectively known as ecosystem services. Ecosystem services include both products (like clean drinking water and recreation opportunities) and processes (like waste decomposition).

Parks protect

- Landscapes that represent the natural diversity of the province

- Unique and special landscapes

- Habitat for common, vulnerable and endangered species

- Headwater and river/riparian areas

- Wetlands

- Biodiversity at all levels - ecosystems, communities, species, populations, genetic

Parks act as benchmarks to evaluate resource use and management in surrounding areas.

Parks provide natural laboratories for scientific research.

Parks act as benchmarks for environmental research.

Parks provide ecosystem services such as

- Air and water quality

- Moderating weather extremes and impacts

- Mitigating climate change
- Providing a base for nature-based recreation/tourism
- Waste treatment
- Nutrient cycling
- Soil formation
- Providing inspiration
- Erosion control
- Pollination

Social Benefits

People come to parks to enjoy the great outdoors - to connect with friends, family and the natural world. The 2008 Alberta Recreation Survey found that 89% of Albertans believe parks and recreation facilities and services improve quality of life.

The social benefits of parks are more difficult to measure than the economic and environmental benefits; however, they are just as important. Social benefits include things with both use and non-use values like

- Spending time with family and friends
- Reconnecting with nature
- Opportunities to experience nature in a range of ways from solitude to adventure
- Safe and sustainable recreation opportunities
- Health and mental wellness
- Promoting and supporting local culture
- Education and interpretation
- Outdoor skills development
- Cultural understanding
- Responsible stewardship and environmental literacy
- Historical understanding and strengthened cultural identity
- Inclusion and access for persons with disabilities

Economic Benefits

Alberta's parks bring millions of visitors to rural communities each year. This creates jobs and

supports economic development both directly and indirectly across the province. Direct benefits to local communities from employment, operations and tourism can be measured.

Visitors to Alberta's parks spend \$1.1 billion annually (from The Value of Alberta Parks...Priceless). This generates a province-wide impact of \$1.2 billion and sustains more than 23,480 person-years of employment.

Heritage rangelands help sustain and directly support cattle grazing, a long-standing economic enterprise.

Parks protect "natural assets" that are the cornerstone of Alberta's nature tourism. This strengthens Alberta's position as a nature-based national and international tourist destination.

Parks help provide opportunities to diversify local and regional economies.

Parks provide backdrops for feature films and commercials which support the film industry and boost rural economies

Economic Benefits

Trails attract a significant number of tourists, contributing to local businesses and economies. Tourists have an increased interest in the outdoors and nature-based activities, and they are willing to travel to pursue special interests and experiences (Active Living – Go for Green, 1995). The influx of tourists leads to development opportunities such as additional bed and breakfasts, campgrounds, motels, retail opportunities for equipment sales, outfitting opportunities and special events. Not only do trails attract new businesses, but they also provide job opportunities and lifestyle benefits that hold residents in the area, resulting in dynamic changes that support sustainable local economies. In addition, trails generate part-time and full-time employment in the respective areas through construction workers and labourers, and ongoing maintenance of the trails requires further employment. Also, property values along and near trails can be expected to rise. According to a report by the U.S. National Parks Service, increases in property values range from 5% to 32%. Increases are particularly noted near greenways that highlight open space rather than highly developed facilities (Royal Commission on the Future of the Toronto Waterfront, 1992).

Source: Alberta Recreation and Parks Association: Trails Policy Paper

<http://www.albertatrailnet.com/for-communities/trail-benefits/economic-benefits/>

image1.png

I haven't found data on the economic value of FCPP in Calgary, but it is undoubtedly high considering the amount of money and effort it takes to keep it running.

FCPP Annual report for 2019 (finances are in the bottom right corner 2nd page.
<https://friendsoffishcreek.org/wp-content/uploads/2020/04/FCAnnualReport.pdf>

See this report on visitor monitoring: http://www.rockies.ca/files/reports/Visitor%20Monitoring%20Program_fish%20Creek%20Provincial%20Park.pdf

Sincerely
Miles Constable