

## 8904 - 99 Street NW

### Position of Administration: Support



## Summary

Charter Bylaw 20847 proposes a rezoning from a Direct Control Zone (DC2.1153) to the Medium Scale Residential Zone (RM h28.0) to allow mid-rise multi-unit residential development up to 28.0 metres in height (approximately 8 storeys) with optional commercial opportunities at the ground level.

Public engagement for this application included a mailed notice, information on the City's webpage, and an Engaged Edmonton webpage. 35 people were heard from, with approximately 7 in support, 14 with mixed opinions/questions only, and 14 in opposition. Most concerns were related to the removal of mandatory ground level commercial, and the loss of amenities and services that used to be on the site.

Administration supports this application because it:

- Aligns with The City Plan and Strathcona ARP by allowing for mid-rise development within the 99 Street Secondary Corridor.
- Provides additional housing options within the Strathcona neighbourhood in proximity to transit, active modes, open space, and amenities.

## Application Details

This application was submitted by Situate Inc. on behalf of Pangman Development Corporation. The proposed Medium Scale Residential Zone (RM h28.0) would allow development with the following key characteristics:

- Mid-rise residential building with optional commercial opportunities at the ground level.
- A maximum height of approximately 8 storeys (max. 28 metres).
- A maximum floor area ratio (FAR) of 3.8 - 5.2.

## Site and Surrounding Area

	Existing Zoning	Current Development
<b>Subject Site</b>	Direct Control Zone (DC2.1153)	Vacant land
<b>North</b>	Medium Scale Residential Zone (RM h16.0) Mixed Use Zone (MU h16.0 f3.5 cf)	Low-rise apartment (Bateman Manor) Vacant land (former gas station)
<b>East</b>	Mixed Use Zone (MU h16.0 f3.5 cf)	One-storey commercial
<b>South</b>	Mixed Use Zone (MU h16.0 f3.5 cf) Small Scale Residential Zone (RS)	One-storey commercial Single detached housing
<b>West</b>	Medium Scale Residential Zone (RM h23.0)	Low-rise multi-unit housing



*View of the site looking north from 89 Avenue NW*



*View of the site looking northeast from the southwest corner of the site*

## **Community Insights**

This application was brought forward to the public using a broadened approach. This approach was selected because previous rezoning applications on this site received significant amounts of community feedback. The broadened approach included:

### **Mailed Notice, April 15, 2024**

- Notification radius: 120 metres
- Recipients: 896
- Responses: 2
  - In support: 1
  - In opposition: 0

- Mixed/Questions only: 1

## **Engaged Edmonton Webpage, April 22, 2024 to May 5, 2024**

- Site visits: 792
  - Aware: 600
  - Informed: 267
  - Engaged: 40
- In support: 6
- In opposition: 14
- Mixed/Questions only: 13

## **Webpage**

- [edmonton.ca/rezoningapplications](https://edmonton.ca/rezoningapplications)

## **Notified Community Organizations**

- Strathcona Community League
- Central Area Council of Community Leagues

## **Common comments heard**

Concerns:

- Ground level commercial uses should remain mandatory (27)
- The removal of existing services/amenities (cafe, grocery store, restaurant, etc.) was a loss for the community (14)
- This highly visible intersection has the potential to become a commercial hub again: diner, cafe, and additional services coming soon (12)
- Mandatory ground level commercial will:
  - Reduce vehicle usage and encourage active modes (9)
  - Reduce carbon emissions and increase sustainability - Council declared a climate emergency in August 2019 (4)
  - Increase safety (4)
  - Help transform the area into a mainstreet. E.g. Whyte Avenue NW, 76 Avenue NW - Ritchie, and 102 Avenue NW - Oliver (4)
  - Increase vibrancy (3)
  - Contribute to the creation of a 15-minute district (3)
  - Increase quality of life / well-being (3)

The most common concern was that ground level commercial uses are optional, not mandatory in the proposed RM h28.0 Zone. In response to this concern, the applicant explained through the Engaged Edmonton page that keeping the commercial uses optional would allow them the

flexibility to change the building design as market needs change and the cost of materials change to hopefully facilitate the development of a site that has been vacant for years. From Administration's perspective, there are no policies that would mandate commercial uses here (see Application Analysis section below for details).

The applicant has been encouraged to provide commercial uses within the ground level to respond to community concerns, and contribute to the intersection of 99 Street NW and 89 Avenue NW which has seen recent commercial investment (e.g. the coffee shop in the former Todd Cleaners site, and future uses in the former Catholic Social Services building).

Support:

- Supportive if this helps get something built on the site (4)
- Provides additional housing in the neighbourhood (3)

Suggestions for Improvements:

- Add a ground level grocery store (8)
- Provide additional landscaping than the minimum, and ensure it survives. 99 Street NW is a gridlocked dust bowl (4)
- Consider the impact of added vehicle traffic, parking and pressure on utilities. E.g. sewer (3)
- Commercial on the main floor should be encouraged/welcomed even though it is optional in the proposed zone (3)

A full "What We Heard" Public Engagement Report is found in appendix 1.

No formal position was received from the Strathcona Community League.

## Application Analysis

### The City Plan

The City Plan is Edmonton's combined Municipal Development Plan (MDP) and Transportation Master Plan (TMP) which describes the strategic goals, values and intentions that direct how Edmonton will grow from 1 million to 2 million people over the next several decades. One key piece of this plan is to accommodate all of this future growth within Edmonton's existing boundaries, with no further annexations or expansions. To do this, 50% of all new residential dwellings are intended to be created at infill locations, focusing on key nodes and corridors.

In The City Plan, the site is within the 99 Street secondary corridor. Secondary corridors are vibrant streets smaller in scale than primary corridors and with a more residential character, some commercial clusters, and local destinations for surrounding communities. They are not consistent for the entire length, but emerge through ongoing redevelopment, investment, and growth. Low-rise and mid-rise development is the typical scale anticipated for secondary corridors. The proposed RM h28.0 Zone aligns with direction provided in The City Plan as it would allow for mid-rise building on the site in alignment with the vision for secondary corridors. In addition, the rezoning facilitates housing growth and intensification within a corridor.

## **Area Redevelopment Plan**

The site is within the boundary of the Strathcona Area Redevelopment Plan (ARP), and is within the 'mid/high rise apartment area' where medium and high density development are supported. Through a previous rezoning application for this site in 2018, the Strathcona Area Redevelopment Plan (ARP) was amended to support a more intense form of development at this location. As amended, the current proposal aligns with the ARP.

Note: This plan is proposed to be repealed as a part of the District Planning Initiative (see next section).

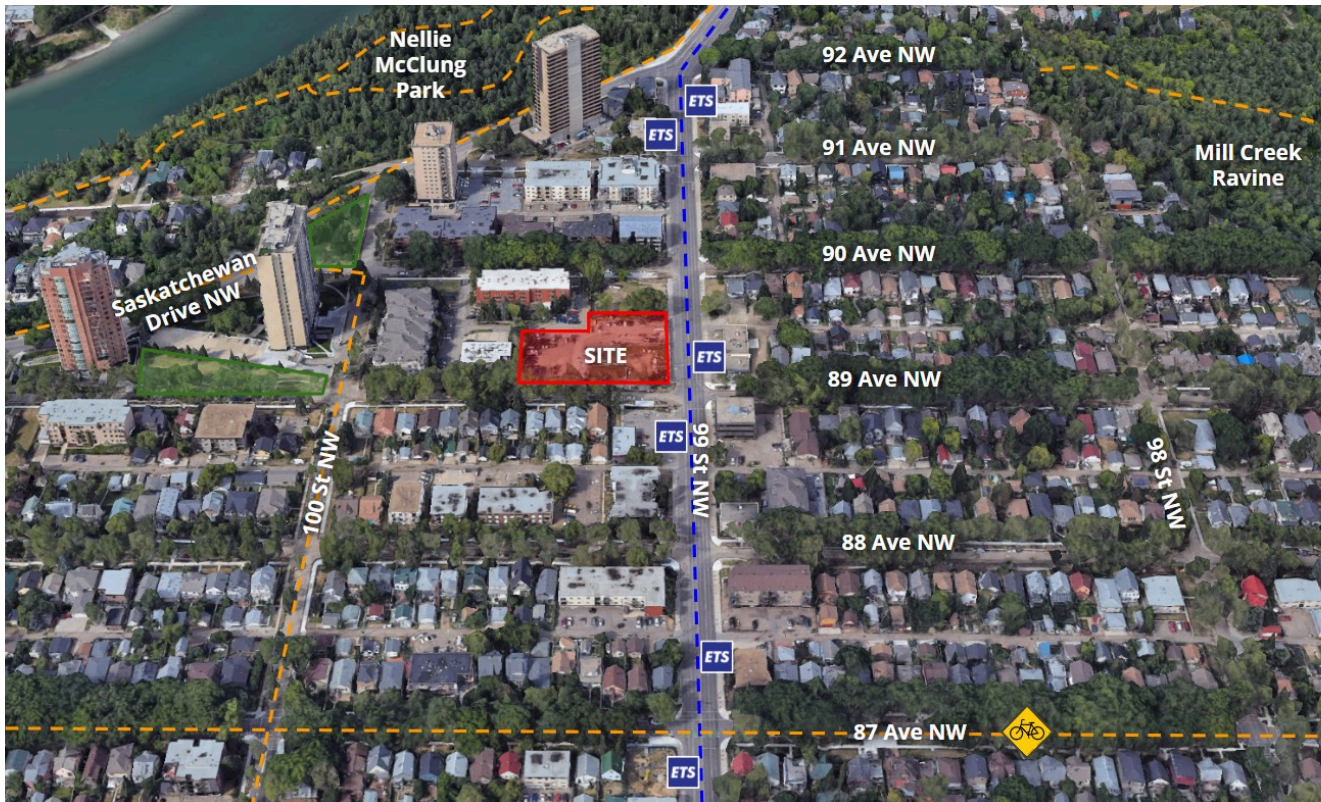
## **Draft District Plans**

At the time of writing this report the District Policy and District Plans are in a final form and are scheduled to be considered by Council on May 28-30, 2024, June 3, 2024 and June 25, 2024. If the District Plans are given two readings during this time the following analysis is provided for Council's consideration.

The site is within the draft Scona District Plan boundary and is within the 99 Street secondary corridor. Secondary corridors connect to Nodes, feature diverse travel modes and may evolve as more commercial or residential over time. As redevelopment occurs, some sites will redevelop as wholly residential, wholly commercial, or as a mixed-use development.

Mid-rise development is defined as buildings between 5-8 storeys in height, and can be supported within secondary corridors along arterial roadways and collector roadways. The site abuts 99 Street NW which is an arterial roadway; therefore, the proposed rezoning to RM h28.0 aligns with the draft District Policy.

## Land Use Compatibility



### *Site analysis context*

The 3530 m<sup>2</sup> site is on the northwest corner of 99 Street NW and 89 Avenue NW. The site is well connected to a variety of active transportation modes. Transit service is available along 99 Street NW (see the 'Mobility' section of this report), 87 Avenue NW and 100 Street NW have a protected bike route, and shared pathways and trails are available in the River Valley and Mill Creek Ravine to the north, west, and east.

Historically this intersection acted as a small-scale commercial hub that serves the neighbourhood and it is in an area of Strathcona that is predominantly medium and high density development with the exception of single detached housing to the south.

Key differences between the current and proposed zones are as follows:

- The current DC2.1153 mandates a small amount (400 m<sup>2</sup>) of ground level commercial, whereas the proposed RM h28.0 Zone has optional opportunities for ground level commercial.
- The proposed RM h28.0 Zone is smaller in scale than the existing DC2.1153 Zone as it has a reduced height, and reduced maximum floor area ratio.

The proposed rezoning is compatible with the existing surrounding development, and will bring additional residents into the area to support the evolving commercial node at the intersection of 99 Street NW and 89 Avenue NW.

A comparison between key elements in the current and proposed zone is provided in the table below:

	<b>DC2.1153 Current</b>	<b>RM h28.0 Proposed</b>
<b>Typical Uses</b>	Multi-unit residential with <b>mandatory</b> ground level commercial	Multi-unit residential with <b>optional</b> ground level commercial
<b>Maximum Height</b>	34.0 m (approx. 10 storeys)	28.0 m (approx. 8 storeys)
<b>Maximum Floor Area Ratio (FAR)</b>	6.0	3.8 - 5.2
<b>Number of Dwellings</b>	Min: n/a Max: 190 dwellings	Min: 32 dwellings Max: n/a
<b>Minimum Setback from 89 Ave</b>	1.0 m (non-residential) 7.0 m (residential)	3.0 m
<b>Minimum Setback from 99 St</b>	2.0 m (non-residential) 4.5 m (residential)	1.0 m (non-residential) 4.5 m (residential)
<b>Minimum Setback from Alleys</b>	10.0 m	3.0 m
<b>Minimum Setback from Abutting Sites</b>	North and west: 1.2 m - 3.0 m (3.0 m over 10.0 m in height)	North and west: 3.0 m
<b>Minimum Setback from Lot Line for Portions of a Building Over 20.0 m in Height</b>	North: 3.0 m West, South, East: 4.5 m	n/a



<p><b>Community Amenity Contributions</b></p>	<p>Min. of 8 dwellings with 3+ bedrooms.</p> <p>\$200,000 for an off-site public amenity in Strathcona.</p> <p>Public realm improvements along 99 St NW and 89 Ave NW bordering the site.</p>	<p>n/a (standard zone)</p>
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**Environment**

To manage existing contamination on the site, additional environmental review will occur at the Development Permit stage prior to redevelopment. The review includes but is not limited to: a Remedial Action Plan, final remediation report, and/or approved Risk Management Plan.

**Mobility**

Vehicular access to the site will be from the abutting lanes to the north and west. The owner will be required to upgrade the entirety of the east-west lane and the north-south lane to the north of the site connecting to 90 Avenue NW to a paved commercial alley standard.

The site is within the 99 Street secondary corridor and accordingly, improvements will be required along 99 Street NW and 89 Avenue NW to ensure an appropriate interface between the building(s) and the public realm. The nature of these improvements will depend in part on whether the ground floor uses are residential or commercial. This will be reviewed in further detail at the development permit stage.

Edmonton Transit Service (ETS) currently operates frequent and local bus routes on 99 Street NW. A mass transit bus route is anticipated to operate on 99 Street NW as part of the future mass transit network associated with the 1.25 million population scenario of The City Plan. Service is anticipated to be similar to current ETS frequent bus service on 99 Street NW and will operate in the existing road right-of-way.

**Utilities**

The applicant has submitted a Drainage Servicing Report that has been reviewed and accepted by Administration for the purpose of supporting this rezoning application.

Development under the proposed zone is required to include on-site stormwater management techniques utilizing an engineered outflow rate to mitigate its impact on the existing drainage infrastructure. Details of the required stormwater management will be reviewed at the Development Permit stage.

Low Impact Development (LID) is recommended and details of any proposed LID would be reviewed at the Development Permit stage.

Edmonton Fire Rescue Services has performed a risk-based Infill Fire Protection Assessment and determined that upgrades are not required. This could potentially be re-evaluated at the development permit stage. The applicant/owner will be responsible for all costs associated with providing required water supply including any changes to the existing water infrastructure required by the proposed zoning.

## **Appendices**

1. "What We Heard" Public Engagement Report
2. Sun/Shadow Study
3. Context Map

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Approved By: Tim Ford

Branch: Development Services

Section: Planning Coordination

# What We Heard Report Strathcona LDA24-0132 (Junction 99)

Edmonton

## Public Engagement Feedback Summary

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**Project Address:** 8904 - 99 Street NW

**Project Description:** The City has received a rezoning application from Situate Inc. to rezone 8904 - 99 Street NW in the Strathcona neighbourhood. The site is currently vacant land. The current zone is a Direct Control Zone (DC2.1153) and the proposed zone is the Medium Scale Residential Zone (RM h28.0) which would allow:

- Mid-rise multi-unit residential development with optional commercial opportunities at the ground level
- A maximum height of 28.0 meters (approx. 8 storeys)
- A maximum floor area ratio of 3.8 - 5.2

**Engagement Format:** Online Engagement Webpage - Engaged Edmonton:  
<https://engaged.edmonton.ca/junction99>

**Engagement Dates:** April 22, 2024 - May 5, 2024

**Number Of Visitors:**

- Engaged: 40
- Informed: 267
- Aware: 600

See “Web Page Visitor Definitions” at the end of this report for explanations of the above categories.

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### About This Report

The information in this report includes summarized feedback received between April 22, 2024 and May 5, 2024 through online engagement via the Engaged Edmonton platform and emails submitted directly to the file planner.

The public feedback received will be considered during the planning analysis to ensure the review of the application takes local context into consideration and is as complete as possible. It will also be used to inform conversations with the applicant about potential revisions to the proposal to address concerns or opportunities raised.

This report is shared with people who provided their email address for updates on this file through the Engaged Edmonton page. This summary will also be shared with the applicant and the Ward Councillor and will be an Appendix to the Council Report, should the application proceed to a Public Hearing.

The planning analysis, and how feedback informed that analysis, will be summarized in the report to City Council if the proposed rezoning goes to a future City Council Public Hearing for a decision. The City's report and finalized version of the applicant's proposal will be posted for public viewing on the City's public hearing agenda approximately three (3) weeks prior to the file's scheduled public hearing.

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### How We Engaged

The Engaged Edmonton webpage included an overview of the application, information on the development and rezoning process and contact information for the file planner. Two participation tools were available for participants: one to ask questions of the file planner (Q&A tool) and one to leave comments (forum tool). The engagement opportunity was communicated to the public through mail notices and through the weekly PSA.

The comments are summarized by the main themes below, with the number of times a similar comment was made by participants recorded in brackets following that comment. The questions asked and their answers are also included in this report.

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### What We Heard: Overall Themes

This section summarizes the main themes collected based on an analysis by the file planner.

Number of Responses: 35

In Support: 7

In Opposition: 14

Mixed: 14

The most common **concerns** heard were:

- **Ground-level commercial being optional:** A majority of respondents indicated that mandatory ground level commercial should be maintained and that the area has the ability to become a commercial hub again.
- **Loss of amenities/services:** Participants indicated that the site was once a community hub (grocery store, cafe, restaurant, etc.) and that the loss of these amenities detracted from the community.

The most recurring comments of **support** heard were:

- **Redevelopment of a vacant site:** Respondents would like to see development happen on this site.
  - **Additional housing:** Respondents saw the benefits of providing additional housing in the Strathcona neighbourhood.
  - **Reduced building size:** Respondents supported the reduction in proposed building height and scale.
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### What We Heard: Comments

The following section includes a summary of collected comments with the number of times a comment was recorded in brackets.

**Note:** The proposed RM h28.0 Zone does not mandate ground level commercial uses, commercial is optional. Many of the comments that have been categorized as 'mixed' or 'in opposition' because they

expressed that ground-level commercial uses should remain mandatory. These comments do not oppose other regulations in the RM h28.0 Zone: the loss of mandatory commercial is the key concern.

### Reasons For Opposition

Ground level commercial uses should remain mandatory (27)

- The removal of existing services/amenities (cafe, grocery store, restaurant, etc.) was a loss for the community (14)
- This highly visible intersection has the potential to become a commercial hub again: diner, cafe, and additional services coming soon (12)
- Mandatory ground level commercial will:
  - Reduce vehicle usage and encourage active modes (9)
  - Reduce carbon emissions and increase sustainability - Council declared a climate emergency in August 2019 (4)
  - Increase safety (4)
  - Help transform the area into a mainstreet. E.g. Whyte Avenue NW, 76 Avenue NW - Ritchie, and 102 Avenue NW - Oliver (4)
  - Increase vibrancy (3)
  - Contribute to the creation of a 15-minute district (3)
  - Increase quality of life / well-being (3)
  - Bring the community together and retain the appeal of the area (2)
  - Attract families (1)
- The developer may not provide commercial uses if they are optional (1)
- Increased population density can be handled, but needs to be balanced with increased amenities (1)
- The big clearly false promise by the city was that with up-zoning there is a guarantee of 15 minute services to a community (1)

### Reasons For Support

- Supportive if this helps get something built on the site (4)
- Provides additional housing in the neighbourhood (3)
- The building height/scale is being reduced (2)
- Need more density on transit arteries to reduce sprawl and support local retailers (2)
- Bringing the lot to life will help 99 street feel safer and more complete (1)
- The proposal keeps with the current residential housing in the area (1)
- Commercial should be optional. Being forced to provide space is no guarantee it will be needed or used (1)
- The proposed zone provides the flexibility needed to build here. The basic form and density are reasonable for the site and lower scale than expected (1)
- Given the history of the site, disappointed to see opposition (1)

### Opportunities for Improvement

- Add a ground level grocery store (8)
- Provide additional landscaping, not the minimum and ensure it survives. 99 Street is a gridlocked dust bowl (4)
- Consider the impact of added vehicle traffic, parking and pressure on utilities. E.g. sewer (3)
- Commercial on the main floor should be encouraged/welcomed even though it is optional in the proposed zone (3)
- Building could be even higher, with proper setbacks (2)

- Rezone to the Mixed Use (MU) Zone with the commercial frontage modifier instead of the Medium Scale Residential Zone (RM h28.0) to ensure that ground level commercial is provided (2)
  - Most multi-unit dwellings do not offer large enough units for families, require a minimum number of 3 bedroom units (3)
  - Build affordable units (2)
  - Construction should take into account the changing climate and have adaptations for hotter, smokier summers, and also make a positive contribution to lowered emissions through EV charging and lower energy usage (2)
  - Make commercial space desirable to diverse retail operations (strip mall units with parking in front is not on brand for the community) (1)
  - There are enough Cannabis Retail Sales uses in the neighbourhood already (1)
  - Increase building height if needed to provide commercial while remaining viable (1)
  - Rezone to the Large Scale Residential Zone (RL) for 10-12 stories to provide more housing in the neighbourhood (1)
  - Ground level commercial would remove future residents from the vehicle smog and noise pollution along 99 Street NW (1)
  - Provide a minimum of 1 parking space per unit. There is virtually no street parking in the area. E-scooter parking is not a replacement for vehicle parking. Many residents that take transit to work own a car for other purposes (1)
  - 99 Street can support mixed-use vibrancy that exists along other main streets (76 Ave NW, Whyte Avenue NW) and has the population density to support it (1)
  - Would like to see commercial and widened sidewalks with trees but I also know those details are realistically addressed at the Development Permit (DP) stage (1)
  - Limit development on 99 Street to the RM Zone. Attempts at high-rise development were not successful which shows that there is not a market for high-rise development in the area (1)
  - There is a market for 'empty nesters' to downsize to an apartment in their neighbourhood (1)
  - Ensure that there is a designated area for recycling, garbage, and composting bins to reduce negative impacts (1)
  - Ensure access to the building and the building are designed to accommodate those with mobility aids/needs. The site is close to transit, which is friendly to those with mobility aids/needs (1)
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### **What We Heard: Questions & Answers**

The following section includes questions received by the file planner and the provided answers. Questions were submitted on Engaged Edmonton and directly to the file planner by email.

#### **Who is the applicant/developer?**

The applicant is Situate Inc. on behalf of Pangman Development Corporation.

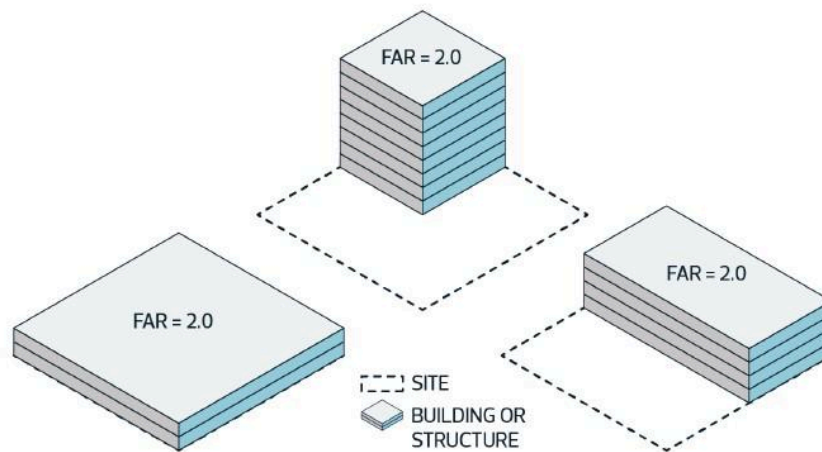
#### **Why are you not committed to commercial on the main floor?**

Response from applicant: "The RM zone (that we're requesting) allows for a variety of commercial uses including retail, grocery stores, offices, restaurants, and medical services. The project team is considering the opportunity to provide commercial space in the building along 99 Street. "The proposed rezoning to a standard zone, rather than a Direct Control zone that requires commercial development, will allow the flexibility to change the building design as market needs change and the cost of materials change, facilitating the development of a site that has been vacant for years. Rezoning to a standard zone will also allow the subject site's zoning regulations to align with future changes to the Zoning Bylaw."

#### **What are the implications of reducing the floor area ratio and height?**

The reduction in Floor Area Ratio (FAR) and height decreases the overall height of the building from approx. 10 storeys (34.0 m) to 8 storeys (28.0 m), and reduces the floor area within the building. This will result in a generally smaller building.

Floor area ratio (FAR) means a building or structure's floor area in relation to the total area of the site that the building is located on. It is a general guide for the scale/intensity of the built form. Example: If you had a maximum FAR of 2.0 it can take different forms (all the below examples show a floor area ratio of 2.0):



The current DC2.1153 has a maximum FAR of 6.0. The proposed RM h28.0 Zone has a maximum FAR that ranges from 3.8 - 5.2, so combined with the decrease in height, the building will be smaller overall.

### **Do vacant properties awaiting development need to be fenced?**

Fencing is not required for sites unless there is an open excavation. Many landowners choose to fence their sites to prevent unauthorized entry.

### **Can I apply to run a hog barn inside this development?**

No, the 'Agriculture' use is not permitted in the proposed RM h28.0 Zone. A farm, or small animal breeding facility such as a hog pen are a typical example of activities that would be considered 'Agriculture'. The 'Agriculture' use is only listed in the Agriculture Zone (AG), Future Urban Development Zone (FD), and Rural Residential Zone (RR). 'Agriculture' is defined as: "farm activity associated with raising animals and production of dairy products, or growing crops, including grains, vegetables and fruits and other plants for economic gain as food, landscaping, fibre, or fuel within a rural context. This may include the sale of agricultural products raised or grown on-site and related accessory products. This Use also allows for large-scale topsoil removal and grading. This Use does not include confined feeding operations as defined by the Agricultural Operations Practices Act, or Cannabis Production and Distribution. Typical examples include: farms, greenhouses, and small animal breeding facilities."

'Urban Agriculture' is a permitted use in the proposed RM h28.0 Zone. Urban Agriculture is a permitted use in all residential zones (with the exception of the Rural Residential Zone (RR)).

'Urban Agriculture' is defined as: "development that involves growing fruits, vegetables, plants, or raising chickens or bees in urban areas for use beyond personal consumption. This activity may include the sale of agricultural products raised or grown on-Site. This Use does not include Cannabis Production and Distribution. Typical examples include: community gardens, food gardens, Hen Enclosures, hydroponic or aquaponic systems, and vertical farms."

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## Engaged Edmonton Visitor Definitions

### Aware

An aware visitor, or a visitor that we consider to be 'aware', has made one single visit to the page, but not clicked any further than the main page.

### Informed

An informed visitor has taken the 'next step' from being aware and clicked on something. We now consider the visitor to be informed about the project. This is done because a click suggests interest in the project.

### Engaged

Every visitor that contributes on the page, either by asking questions or leaving a comment, is considered to be 'engaged'.

Engaged and informed are subsets of aware. That means that every engaged visitor is also always informed AND aware. In other words, a visitor cannot be engaged without also being informed AND aware. At the same time, an informed visitor is also always aware.

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## Next Steps

The public feedback received will be considered during the planning analysis and will be included in the administration report for City Council. The administration report and finalized version of the applicant's proposal will be posted for public viewing on the [City's public hearing agenda](#) website approximately three (3) weeks prior to a scheduled public hearing for the file.

When the applicant is ready to take the application to Council (the Administration makes a recommendation of Support or Non-Support):

- Notice of Public Hearing date will be sent to surrounding residents, and applicable nearby Community Leagues and Business Associations.
- Once the Council Public Hearing Agenda is posted online, members of the public may register to speak at Council by completing the form at [edmonton.ca/meetings](http://edmonton.ca/meetings) or calling the Office of the City Clerk at 780-496-8178.
- Members of the public may listen to the Public hearing on-line via [edmonton.ca/meetings](http://edmonton.ca/meetings).
- Members of the public can submit written comments to the City Clerk ([city.clerk@edmonton.ca](mailto:city.clerk@edmonton.ca)).

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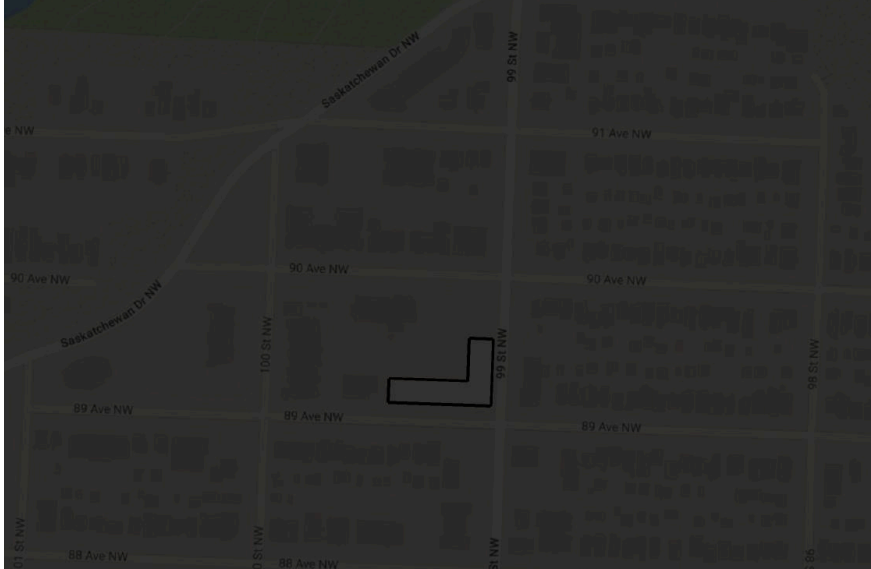
If you have questions about this application, please contact:

Saffron Newton, Planner  
780-423-3224  
[saffron.newton@edmonton.ca](mailto:saffron.newton@edmonton.ca)



# SUN/SHADOW STUDY

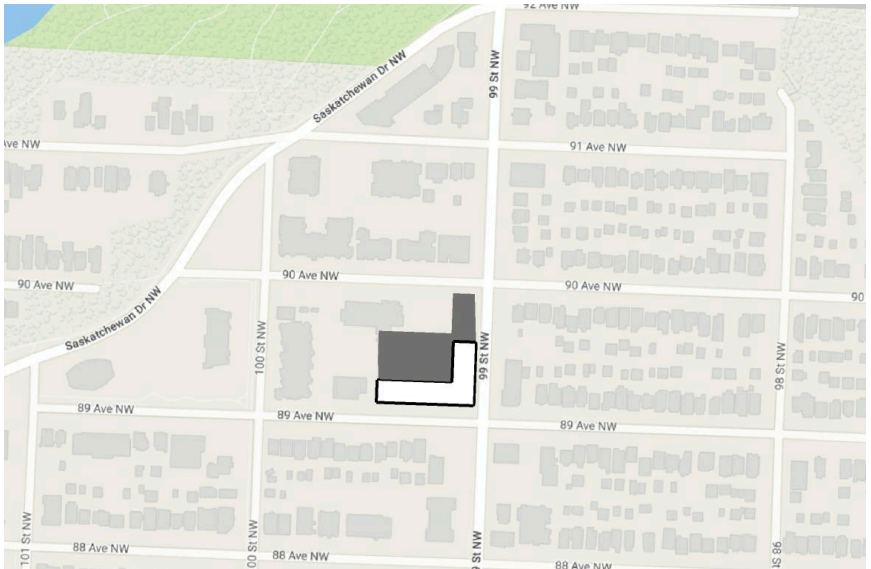
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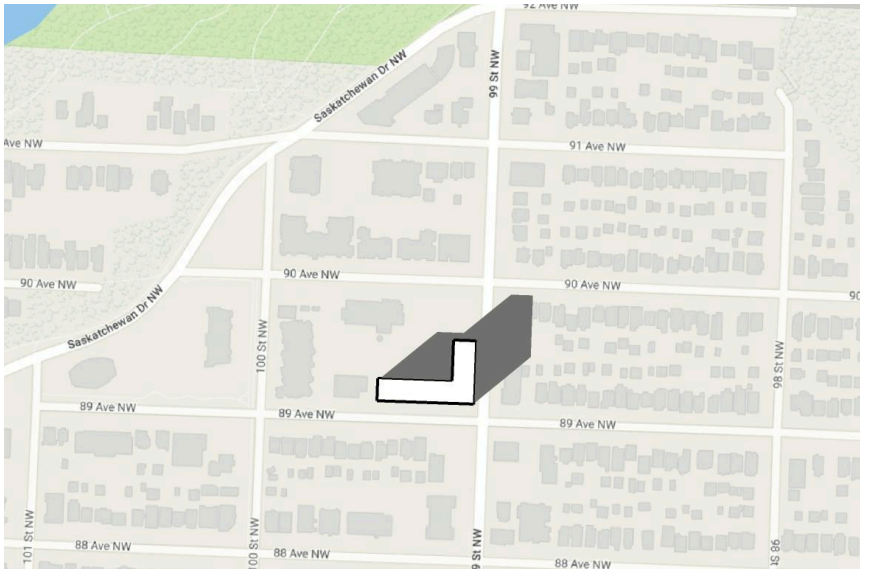
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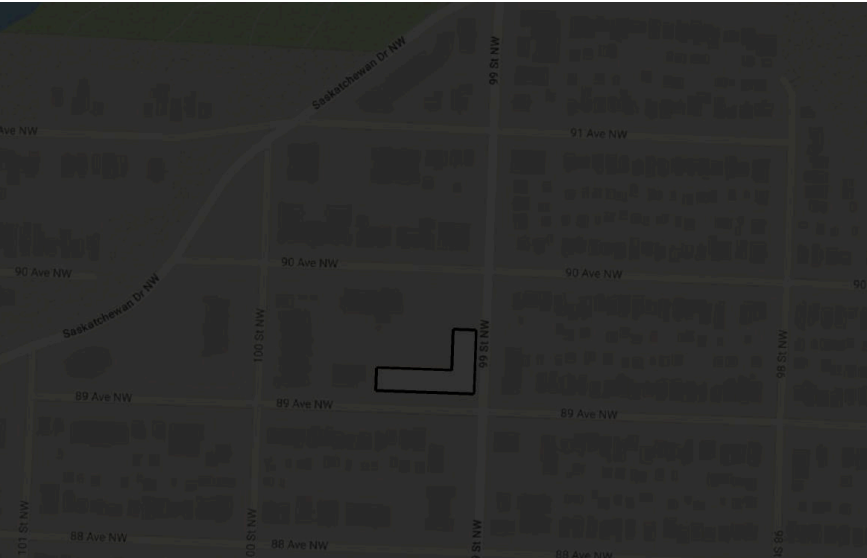
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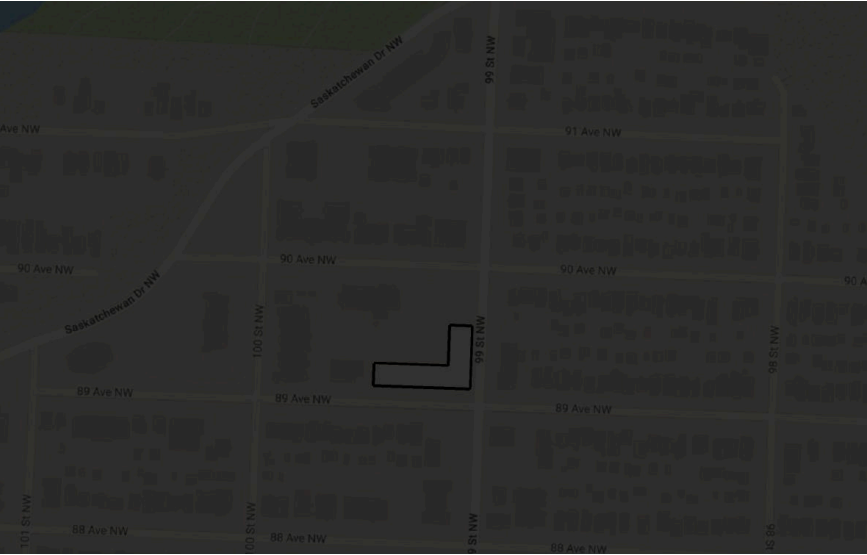


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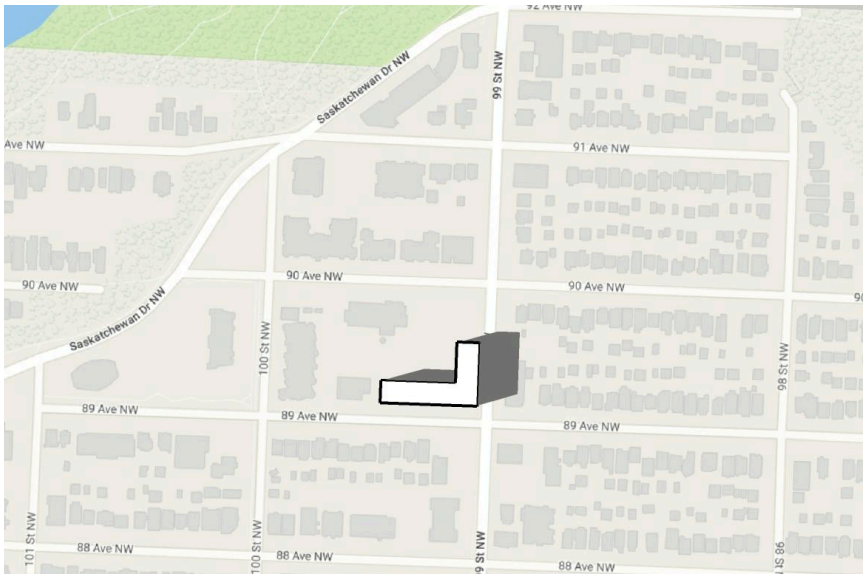
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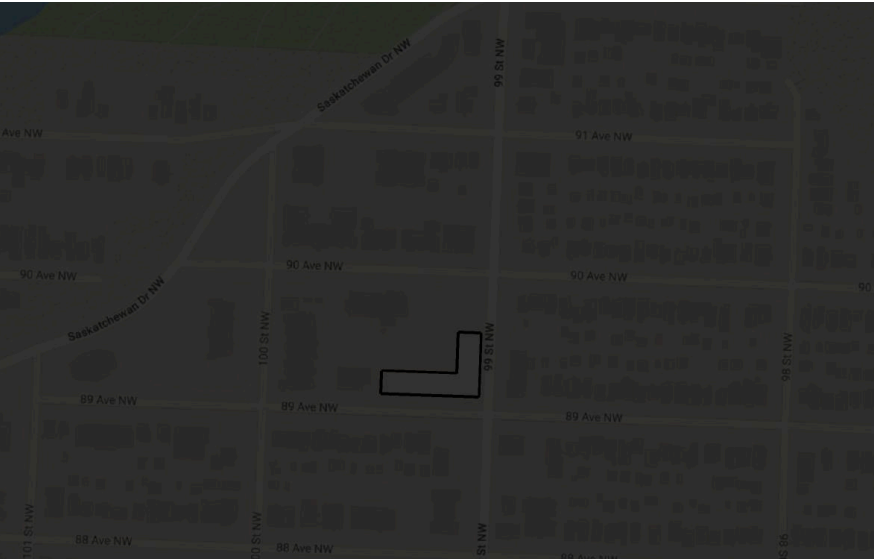
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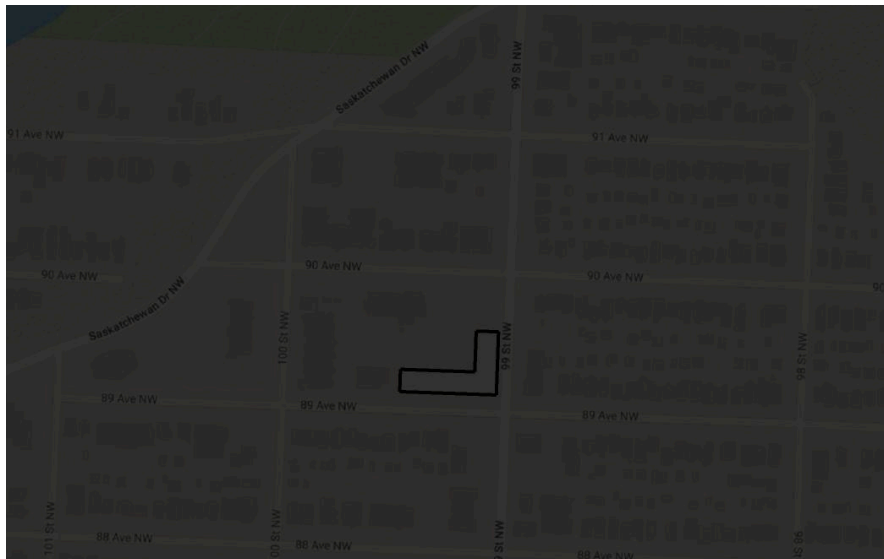
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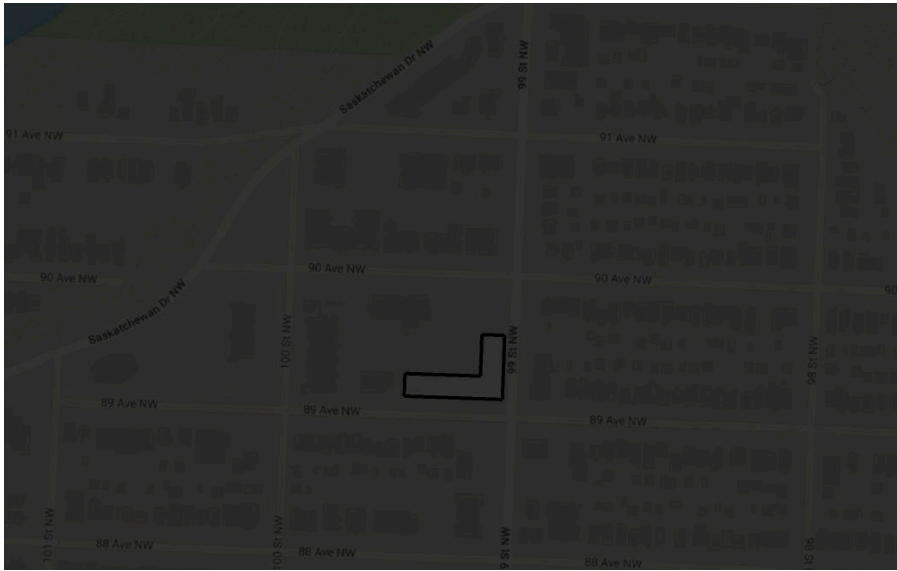


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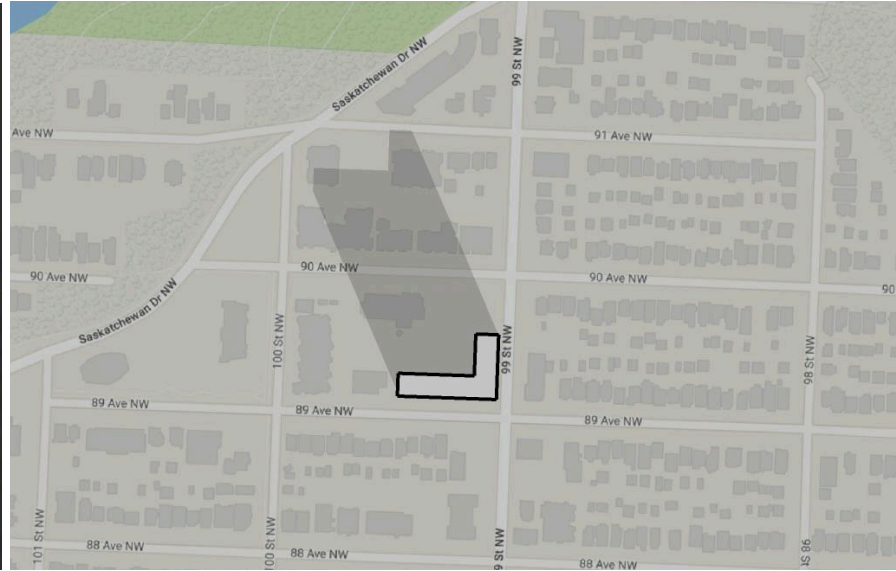


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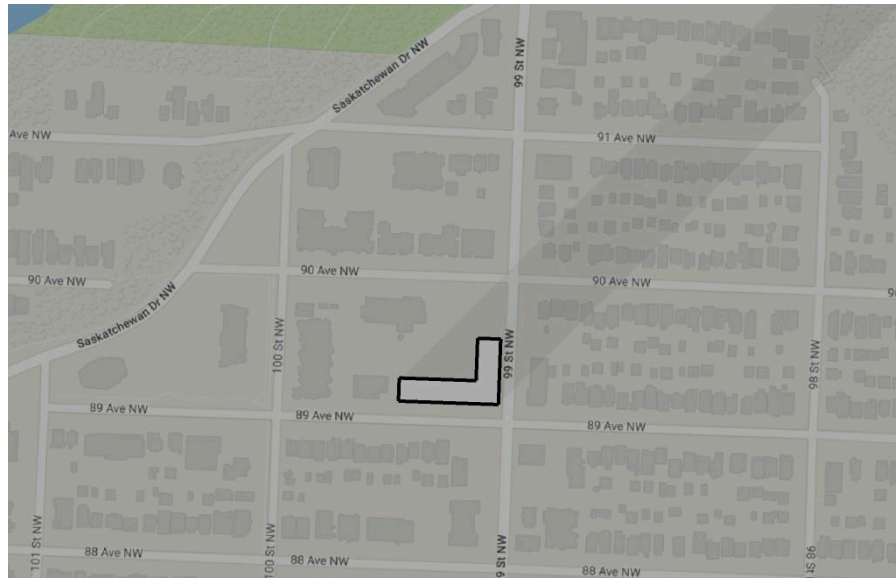
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# STRATHCONA

## Area Redevelopment Plan

### Figure 4 - Mid/High Rise Apartment Area



 Mid/High Rise Apartment Area

