

## 7204 - 184 Street NW

### Position of Administration: Support



## Summary

Bylaw 20955 proposes a rezoning from the Future Urban Development Zone (FD) to the Parks and Services Zone (PS) and the Medium Scale Residential Zone (RM h16) to allow for larger scale parks and amenities and medium scale housing.

Public engagement for this application included a pre-application notice (from the applicant), a mailed notice, site signage, information on the City's webpage, and an Engaged Edmonton webpage. Approximately 69 people were heard from, with approximately 1% in support and 91% in opposition, while the remaining 8% had clarification questions. Most concerns were related to a loss of greenspace, traffic/congestion, engagement process, increased crime and concern over a decrease in property values.

Administration supports this application because it:

- Is compatible with surrounding land uses.
- Aligns with The City Plan by providing for a school and park site and accommodating growth through the compact development of new neighbourhoods, including all future growth for an additional 1 million people within Edmonton's existing boundaries.
- Contributes to the City Plan's Big City Move, A Rebuildable City, by contributing to the target of providing 50 percent of new units through city wide infill.
- Contributes to The City Plan's Big City Move, Inclusive and Compassionate, by providing an opportunity for affordable housing, and reducing the number of Edmontonians who are in core housing need.
- Is in alignment with *City Policy C583A: Developing Surplus School Sites*, which prioritizes access to affordable housing, increased housing choice and the integration of housing, services and amenities.

## Application Details

This application was submitted by the City of Edmonton Real Estate Branch on behalf of the Housing Action Team.

The proposed Parks and Services Zone (PS) would allow development with the following key characteristics:

- Community uses, including Parks and Child Care Services.
- Maximum building height of 16.0 m (approximately four storeys).

The proposed Medium Scale Residential Zone (RM h16) would allow development with the following key characteristics:

- Medium scale housing, including multi-unit housing in the form of row housing and/or apartment housing.
- Maximum building height of 16.0 m (approximately four storeys).
- Maximum Floor Area Ratio 2.3.
- Minimum density of 45 dwellings per net residential hectare.

## Site History

The City received 20 surplus school sites from the Edmonton Public School Board in 2009 after they were no longer required for schools. In 2015, City Council identified 14 surplus school sites for affordable housing. The development of these sites is guided by policy C583A, which prioritizes access to affordable housing, increased housing choice and the integration of housing with nearby services and amenities.

## Site and Surrounding Area

The application area is located on a corner site, north of 72 Avenue NW and west of 184 Street NW in the central portion of the Lymburn neighbourhood. The Lymburn school and community league building is located west of the subject site, while the remaining surrounding development



to the east and south consists of single-family housing. The overall park/school site encompasses several sports fields for soccer and football. Transit Service is available on 188 Street NW and active mode connections are located west of the subject site.

	<b>Existing Zoning</b>	<b>Current Development</b>
<b>Subject Site</b>	Future Urban Development Zone	Undeveloped/Open Space
<b>North</b>	Parks and Services Zone (PS)	Park/School/Community League building site
<b>East</b>	Small Scale Flex Residential Zone (RSF)	Single detached housing
<b>South</b>	Small Scale Residential Zone (RS)	Single detached housing
<b>West</b>	Parks and Services Zone (PS)	Park/School/Community League building site



*Street view of the site looking north from 72 Avenue NW*

## **Community Insights**

This application was brought forward to the public using a broadened approach. This approach was selected because the proposed rezoning generated an influx of community feedback and comments. The broadened approach included:

## **Pre-Application Notice (from City of Edmonton's Housing Action Team), April 16, 2024**

- Notification radius: 120 metres
- Number of recipients: 146
- Number of responses (as reported by the applicant): 5
- Main comments received (as reported by the applicant):
  - Loss of park and open space.
  - Additional crime and noise resulting from the proposed use/users.
  - Unfairness of affordable housing being proposed in low-income areas.
  - Additional traffic resulting from the proposed development.
  - Lack of capacity of utilities to handle proposed development.

## **Mailed Notice, May 14, 2024 (from Development Services)**

- Notification radius: 121+ metres (customized search)
- Recipients: 348
- Responses: 20
  - In support: 1 (5%)
  - In opposition: 15 (75%)
  - Mixed/Questions only: 4 (20%)

## **Engaged Edmonton Webpage, May 27, 2024 to June 9, 2024**

- Visited the page: 316
- Submitted a question or forum response: 49
  - In support: 0
  - In opposition: 48
  - Mixed/Questions only: 1

## **Site Signage, May 27, 2024**

- One rezoning information sign was placed on the property to be visible from 72 Avenue NW and 184 Street NW

## **Webpage**

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

## **Notified Community Organizations**

- Lyburn Community League

- Callingwood-Lymburn Community League
- Edmonton Federation of Community Leagues

### **Common comments heard:**

- It will increase traffic congestion in the neighbourhood (x34).
- The notification should have been sent to the entire neighbourhood and that the notification area used (120 metres) was insufficient (x24).
- The proposed development will increase criminal activity and reduce neighbourhood safety (x24).
- The proposed development will result in a loss of green space (x19).
- The site must continue as a space where kids play, team sports take place and dog walkers pass through (x19).
- The proposed development will decrease property values in the area (x18).
- It will increase demand for on-street parking (x18).
- The proposed development is out of character with the neighbourhood (x16).
- Alternative locations should be explored (x11).

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

## Application Analysis



Site analysis context

## The City Plan

Within The City Plan, the subject site is identified as a residential infill area. As part of The City Plan's goal to accommodate 50% of new homes through infill, infill is expected to be constructed at a variety of scales in areas like Lymburn. The proposed rezoning is also supported by policies in The City Plan which allow Edmontonians to live locally and support growth within approved neighbourhoods.

In alignment with the Big City Move, to be a Rebuildable City, the repurposing of a planned school building envelope for affordable multi-unit housing reflects shifting needs and opportunities that have emerged since the neighbourhood was originally planned. The proposal aligns with policies to enable all districts to achieve more income-diverse neighbourhoods and a greater mix of land uses and ensure all areas of the City meet or exceed regional density targets as they redevelop over time.

The City Plan envisions a future where no Edmontonian is in core housing need and where all Edmontonians spend less than 35% of average household expenditures on housing and transportation. These fall under the Big City Move, to be an Inclusive and Compassionate City. The proposed rezoning enables the future provision of affordable housing under *City Policy C583A: Developing Surplus School Sites*, contributing to objectives of The City Plan to pursue partnerships to end poverty and streamline the provision of affordable housing in all neighbourhoods.



## Draft District Plan

At the time of the writing of this report, the District Policy and District Plans have received first and second reading from City Council and are now at the Edmonton Metropolitan Regional Board before they return to Council for consideration of third reading. Given this, the following analysis is provided for Council's consideration.

This application falls within the West Edmonton District Plan where it is designated as Urban Service. Although the proposed rezoning doesn't match the identified land use designation as described by the District Plan, a policy exception (C.1 Lymburn - Land Use (Surplus School Site) provides additional direction stating:

*"The 11.4 hectare subject site includes 2.6 hectares dedicated for two school sites. One school site was developed, and the other was declared surplus by local school boards in 2009. The surplus school site was approved for residential development by City Council in 2015. Small Scale and Low Rise residential developments are appropriate for the surplus school site."*

Therefore the proposed rezoning aligns with the policies of the West Edmonton District Plan.

Additionally, the proposed rezoning aligns with the District General Policy 4.2.3.4 to support access to affordable housing in all districts, with a target affordable housing rate of 16 percent in all neighbourhoods, or as otherwise directed by City Council policy.

## City Policy C583A

Approved in 2015, the *City Policy C583A: Developing Surplus School Sites* provides guidelines for the development of identified surplus school sites, including Lymburn. The guidelines include the following principles:

- **Access to affordable housing:** Surplus school sites provide a valuable opportunity for increasing Edmontonians access to affordable housing, while utilizing existing infrastructure in established neighbourhoods.
- **Increase housing choice:** Development on the surplus school sites will align with the City Plan objective to establish housing for a range of household types and sizes, excluding single detached housing, and provide access to affordable housing in neighbourhoods where it may be limited.
- **Integrate housing, services and amenities:** Ensure housing services and amenities are available to support the needs of residents and the community, where possible.

The development of this site prioritizes access to affordable housing, increased housing choice and the integration of housing services and amenities.

## Land Use Compatibility

The subject site is currently zoned Future Urban Development Zone (FD) and has been deemed a surplus school site available for development. If approved, the RM h16 Zone will allow Medium scale housing, including multi-unit housing in the form of row housing and/or apartment

housing. Additionally, the proposed PS Zone will allow for ongoing Community uses, including Parks and Child Care Services.

Both the RM h16 and PS Zones allow for buildings of up to 16.0 m in height (approximately four storeys).

The proposed RM h16 and PS Zones would allow for an increased building height from the currently permitted 12.0 m up to 16.0 m. Additional changes with the proposed zones include reduced setbacks and opportunities for medium-scale residential development (under the RM h16 Zone).

The RM h16 Zone is compatible with the adjacent PS Zone, and will provide an appropriate transition at a scale that is sensitive to the surrounding neighbourhood.

The table below summarizes the main regulations of each.

	<b>FD Current</b>	<b>RM h16 Proposed</b>	<b>PS Proposed</b>
<b>Typical Uses</b>	Agriculture Urban Agriculture Special Event	Residential	Park Outdoor Recreation Service Child Care Service
<b>Maximum Height</b>	12.0 m	16.0 m	16.0 m
<b>Minimum Density</b>	N/A	45 du/ha	N/A
<b>Minimum Front Setback</b>	7.5 m	3.0	6.0 m
<b>Minimum Interior Side Setback</b>	7.5 m	3.0 m	4.5 m
<b>Minimum Rear Setback</b>	7.5 m	3.0 m	4.5 m



## Mobility

Administration reviewed a Transportation Impact Assessment (TIA) submitted in support of this application. The TIA confirms that the existing mobility network can accommodate the proposed development, and recommends that the temporary curb extensions at the adjacent 72 Avenue NW and 184 Street NW intersection be upgraded to permanent infrastructure upon development in order to improve sightlines and shorten the pedestrian crossing distance.

Bus service is available nearby on 69 Avenue NW, 76 Avenue NW and 188 Street NW. The site is roughly 400m walking distance to bus stops on those corridors. A bus stop that is currently not in service is located adjacent to the site on 184 Street. As service may return to this corridor in the future, the bus stop pad will be retained.

## Open Space

The subject site was deemed surplus to municipal requirements in 2009 by City Council and identified for affordable housing. Redevelopment of this site shall consider field impacts and identify appropriate relocation or realignment opportunities to ensure programming needs are maintained.

## Utilities

Development allowed under the proposed zone would be required to include on-site stormwater management techniques utilizing a controlled 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.

Edmonton Fire Rescue Services has performed a risk-based Infill Fire Protection Assessment and determined that the subject site is reasonably compliant with municipal standards for firefighting water. 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

Written By: Luke Cormier

Approved By: Tim Ford

Branch: Development Services

Section: Planning Coordination

# What We Heard Report

## Lymburn

### LDA24-0148

Edmonton

## Public Engagement Feedback Summary

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**Project Address:** 7204 - 184 Street NW

**Project Description:** The City has received a Rezoning application from the City of Edmonton Real Estate Branch on behalf of the Housing Action Team. The current zone is the Future Urban Development Zone (FD) and the proposed zones are the Parks and Services Zone (PS) and the Medium Scale Residential Zone (RM h16).

The PS Zone would allow:

- community uses, including Parks and Child Care Services
- a maximum building height of 16.0 m (approximately four storeys)

The RM h16 Zone would allow:

- for medium scale housing, including multi-unit housing in the form of row housing and/or apartment housing
- a maximum building height of 16.0 m (approximately four storeys)
- a minimum density of 45 dwellings/ha

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

**Engagement Dates:** May 27, 2024 to June 9, 2024

**Number of Visitors to Engaged Edmonton page:** Visited the page - 316  
Submitted a question or forum response - 49

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### About This Report

The information in this report includes summarized feedback received between May 27, 2024 and June 9, 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 all web page visitors who provided their email addresses for updates on this file. 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 City's 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 a scheduled public hearing for the file.

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## Engagement Format

The Engaged Edmonton webpage included an overview of the application, information on the development and rezoning process, a brief history of the surplus school sites across the City and contact information for the file planner. Two participation tools were available for participants: the 'Ask a Question' and 'Share Your Thoughts'. The 'Ask a Question' tool allowed participants to ask questions directly to the project team. Once answered, the question and response would both either be shared publicly on the Engaged Edmonton page, or sent privately back to the participant. The 'Share Your Thoughts' tool allowed participants to share feedback on an open forum. They could also respond to and 'like' the comments of others, allowing participants to engage in conversation with each other.

The comments received 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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## Feedback Summary

This section summarizes the main themes collected on Engaged Edmonton, as well as emails and phone calls received by the planner.

Number of Responses:

In Support: 0

In Opposition: 69

Mixed: 0

The most common **concerns** heard were:

**Communication Process/Engagement Process:** Concerns that the neighbourhood notification should have been sent to all residents of the Lymburn neighbourhood to ensure a fair and transparent engagement process. Concerns that due to the proximity to the existing public elementary school, all residents including parents of children at that school should have been notified. The Lymburn Surplus Engaged Edmonton Website should have been live for 4 weeks instead of 2 and citizens expressed that a survey should have been provided offering zoning options. An in-person meeting should have been held instead of an online virtual meeting. There is a lack of consistency with respect to the engagement process for the Lymburn school sites, when compared to the nearby Oleskiw surplus school site. The engagement

process should be applied equitably with the same consistent communication process. Citizens expressed sentiment that the public engagement process was rushed.

**Increased Traffic and Parking Congestion:** The area is already experiencing congestion, and adding additional housing units into the neighbourhood will add to this while also creating safety concerns. Parking during peak times is limited. This proposed development will create additional traffic and parking congestion issues along 184 Street between 76 Avenue NW and 69 Avenue NW. Drivers speeding and shortcutting through the neighbourhood on 184 Street have already been identified to the "Vision Zero" group with City Administration and to Edmonton Police Service due to the high number of near misses and collisions.

**Density:** An increase in density will create several issues for the neighbourhood, along with putting a strain on the surrounding infrastructure and roadway system. The neighbourhood is already densely populated. Concerns were also expressed about how the development could negatively impact the Lymburn Public Elementary School causing overcrowding and enrolment issues. Lymburn already has the highest density of 25 total dwellings per hectare, compared to other west end neighbourhoods within close proximity.

**Loss of greenspace:** There is a concern that the proposed development will take away greenspace in the area. The site is currently used to host numerous sporting activities, for neighbourhood children to play with their friends and for dog walking. Residents expressed the desire to keep the site as is to continue enjoying such activities. Green space should be preserved as a neighbourhood amenity and space for community gathering.

**Decrease in property values:** The proposed affordable housing development will lower property values for the surrounding community. The 2024 single family home assessment values are lower than the 2024 average citywide median.

**Increased Crime:** The introduction of an affordable housing project will result in an increase in criminal activity, mischief, theft and noise in a location close to an existing school.

**Not in Character with the Surrounding Area:** A development of 16 meters (4 storeys) at this location within the middle of the Lymburn neighbourhood would not be compatible with nearby single family homes. Also, the proposed development will not conform with the present use of the lands surrounding the surplus school site.

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## What We Heard

The following section includes a summary of collected comments with the number of times a comment was recorded in brackets (comments received once do not have a number).

### Reasons For Opposition

#### Traffic/Parking

- Will increase traffic congestion in the neighbourhood (34)
- Will increase demand for on-street parking (18)
- The increase in traffic will cause unwanted noise (7)
- Increased pollution in the area (2)
- There will be a lack of space for garbage collection due to increased on-street parking (2)
- A development of this nature belongs on an arterial roadway (2)
- Opposition to the proposed traffic light (1)



### **Loss of Greenspace**

- The proposed development will result in a loss of greenspace (19)
- The site is where kids play, hosts sporting events, dog walking and must be preserved (19)
- The proposed development will obstruct existing residents' views of greenspace (8)
- Would support more greenspace, not less greenspace as proposed (7)
- Many homes in the area have limited yard space and benefit from the greenspace as is (3)

### **Engagement and Notification**

- The notification should have been sent to the entire neighbourhood; public notices were insufficient (17)
- The deadline for the Lymburn Engaged Edmonton website should have been extended 2 weeks (3)
- A survey should have been provided to all residents (3)
- The engagement is ineffective (residents weren't adequately heard from and engaged with) (2)

### **Safety/Crime**

- The proposed development will increase criminal activities (24)
- The proposed development will cause safety concerns due to the increase in traffic volumes (11)
- Safety concerns regarding the proximity to the Lymburn Public Elementary school (10)

### **Density**

- The Lymburn neighbourhood already has a high density (8)
- The increase in density will cause overcrowding in the Lymburn Public Elementary school (6)
- General opposition to the increased density (5)

### **Other**

- The proposed development will decrease property values in the area (18)
- The proposed development is out of character with the neighbourhood (16)
- Alternative locations should be explored (11)
- General opposition to the proposed development (10)
- People who require affordable housing would benefit from being located near support facilities, employment opportunities and access to public transit (8)
- The proposed development will compromise the physical and health of residents (3)
- In favour of senior housing instead (3)
- Request for a development of a smaller scale (3)
- The proposed development will cause an increase in property taxes (3)
- The proposed development will result in a damaged sense of community (2)
- The proposed development will cause sun shadowing (2)
- Doubts about whether the development will remain as affordable housing in the future
- The proposed development will result in a loss of privacy

### **Suggestions For Improvement**

The following comments were provided as part of the Engaged Edmonton website:

- A development of this nature belongs along a major arterial road, such as either 178 Street NW or 69 Avenue NW.
- Low-impact senior housing could be a beneficial addition, catering specifically to the needs of our aging population while maintaining the neighborhood's character
- Why not utilize empty buildings and parking lots in the downtown for this type of development.

- There are numerous vacant buildings and lots in areas already equipped with the necessary infrastructure and services to support high-density developments. Utilizing these spaces would align better with broader city planning goals without disrupting mature residential neighborhoods
- Community gardens would be a great and beneficial way for us to build the community
- Affordable housing should be on main streets near public transportation and shopping centers, not in the middle of a neighbourhood with solely single-family dwellings
- If there has to be a building, consider a compromise for a smaller project
- This project would be better off closer to the amenities in our neighborhood such as the library, grocery store and recreation center
- If this proceeds, consideration should be given to using the space for seniors housing, given the proximity of senior's amenities and the group's needs.
- The remnant of lot 60 should be increased to 1.275, and the shape of lot 60 be more rectangular, not lot "L" shaped. New lot 1 should be shortened at the left boundary and moved to the north boundary, therefore making lot 60 rectangular.

### Suggestions For Improvement (Lymburn Citizen Group)

The following comments were provided to Administration on August 9, 2024 as a result of a meeting hosted by the Lymburn Citizen Group meeting held on July 10, 2024. From that meeting the Lymburn Citizen Group explored a number of development choices which were shared with the citizen group members through Facebook and email for Administration's consideration. The results from respondents choices are identified below:

- **"1st Choice (100% of respondents voted in favour):** Our Lymburn Citizens Group requests that the City cancel its April 16th rezoning application concerning the Lymburn surplus school site, legally described as Plan 8321754 Block 42 Lot 60, municipal address 7204 - 184 Street NW. We request that this site be retained as park space by the City of Edmonton, and its title be caveated, so its current use as park space would continue into perpetuity. It would then continue to serve for existing school activities, citywide community league sports, frisbee football, cross country skiing, and other recreational activities for the enjoyment of all residents both within and outside the neighbourhood."
- **"2nd Choice (83% of respondents voted in favour):** In the event that City Council will not agree to leave the surplus school site as park space, our Lymburn citizen group, request the following; That the City as owners of all lots, legally described as Plan 8321754 Block 42 Lots 58, 59 and 61MR, (directly to the north of the current surplus school site) re-subdivide these lots to create a 1.4 hectare parcel for any future proposed affordable housing development. Then the City make application to rezone this new site, from PS to RSMh12, and relocate the affordable housing site to the northeast corner of the existing park space. This would place any future affordable housing development adjacent to an already existing privately owned row housing rental complex (Lymburn Place), currently zoned RSMh12, located at 18415-75 Avenue NW, and legally described as Plan 8321698 Block 42 Lot 56.

We are aware that the City has previously agreed to relocate developments on two affordable housing surplus school sites within the neighbourhoods of Summerlea and Wedgewood.

The City or developer would then construct a road to this site, west of 184 Street, creating 73A Avenue NW, which would then provide access / egress along the north side of the new site. Additional access / egress would also be provided to the site along the east side from 184 Street NW.

In addition, our citizen group requests that the City/developer then utilize the 1.15 hectare PS zoned land area, previously identified in their application of April 16th, as an additional buffer or setback along the west side of 184 Street NW.

This PS zoned park space would be landscaped and treed, so current residents located along the east side of 184 Street NW, north of 73 Avenue NW, would be provided a landscaped green park space with trees to view when looking west towards any future development.

The majority of residents along 72 Avenue NW, west of 184 Street NW, facing north, would continue to view park space, as well as the majority of residents facing west along 184 Street NW, north of 72 Avenue NW.

The corner at 184 Street NW and 72 Avenue NW would become less of a health and safety concern for parents of school children, residents, and sports enthusiasts when crossing the intersection at 184 Street and 72 Avenue.

This RSMh12 land use zoning will efficiently add density to the Lymburn neighbourhood, while maintaining a more compatible land use with surrounding existing single family homes and limit any development to a lower building height.

Our citizens group also encourages that under the affordable housing designation, the current Building Housing development program choice for an affordable subsidized rental development for seniors living be given the highest consideration for development for this site.

This development type would provide Lymburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing."

- **"3rd Choice (9% of respondents voted in favour):** In the event that City Council will not agree to leave the surplus school site as park space, our Lymburn citizen group, request the following; that the existing City RMH16 zoning application of April 16, 2024 be cancelled and a new application be made to reflect a land use zoning of RSMh12 Scale Transitional Residential Zone and PS.

Utilize the 1.15 hectare PS zoned parcel, (identified in prior application) for future park space only, to provide an additional set back along both 72 Ave and 184 street, instead of along the prior application described western boundary of lot 60.

This RSMh12 land use zoning will efficiently add density to the Lymburn neighbourhood, while maintaining a more compatible land use with surrounding existing single family homes and limit any development to a lower 12 metre building height.

Our citizens group also encourage that under the affordable housing designation, the current Building Housing development program choice for an affordable rental development for seniors living be given the highest consideration for development for this site. This development type would provide Lymburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing."

- **"4th Choice (4% of respondents voted in favour):** Our Lymburn citizens group request tha the existing City zoning application of April 16, 2024 be cancelled. Then a new application be made by the City Real Estate Branch to rezone Plan 8321754 Block 42 Lot 60 to RSMh12 Scale Transitional Residential Zone and PS.

The City would continue to utilize the existing surplus school site with the restriction that developers could only construct row housing with a two storey maximum height along the peripheral of the site, along both 72 Avenue NW and 184 Street NW, and then construct a maximum 3 storey height multi residential development behind the row housing.

Then the City utilize the additional 1.15 hectare PS zoned parcel, for future park space only, to provide an additional set back along both 72 Avenue NW and 184 Street NW, instead of just along the prior described western boundary of lot 60.

Our citizens group also encourage, that under the affordable housing designation, the current Building Housing development program choice for an affordable subsidized rental development for seniors living be given the highest consideration for development for this site.

This development type would provide Lyburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing."

A full copy of the Lyburn Citizen Group Dispute Resolution Choices document is attached below.

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## Questions & Answers

### **1. Why did it take 6 years from the year the City received the Lyburn surplus site to designate the "Lyburn" Surplus School Site as Affordable Housing?**

As with many projects, the decision was made following extensive review and consideration.

In 2011, a request for expression of interest was advertised publicly to explore interest in developing vacant surplus building sites for new residential uses. Submissions received by the City indicated a strong interest in developing new seniors housing on some sites. Based on the interest as well as input from City staff and a review of new strategic directions, a report was brought to Council in 2012 to remove Municipal Reserve designations for specific sites outlined in the report to allow for the development of future seniors housing.

All 2009 surplus school sites were to be developed as mixed market housing (some units to be affordable and the remaining to be market). There were some exemptions with Council's approval. Three of the 20 sites were retained for municipal uses, such as a storm pond. Three sites were repurposed to allow for housing under the First Place Program and one for a school. Those decisions were made following a circulation process in which City departments and external partners, such as other school boards, review available land assets. Lyburn was not selected for any other need following that circulation process. In 2015, Council approved the direction for the development of the remaining 14 surplus school sites received in 2009 under Policy C583. Policy C583A represents the current direction.

### **2. What was the criteria used by the administration to perform this individual site analysis of the Lyburn surplus site before making its recommendation to designate as "Affordable Housing " to City Council? Can we receive a copy of the criteria and the analysis report results?**

Any land suitable for residential development is suitable for affordable housing development. The City has undertaken several studies to confirm feasibility, including environmental, servicing, transportation and traffic impact.



- 3. Certain surplus school sites received by the City in 2009, 2012, & 2015, are located adjacent to large park spaces. (Eg. Oleskiw Surplus School Site). Future development on these surplus sites would have less impact on neighbourhood residents with regard to existing elementary school enrolment increases.**

**Why wouldn't the City have concentrated its development plans on these surplus school sites first?**

Administration is following Council's direction, which is to pursue affordable housing development on the remaining surplus school sites received by the City in 2009.

- 4. Why and how were the five sites; Belmont, Blue Quill, Dunluce, La Perle, and Lymburn chosen by the Housing Action Team to pursue rezoning approval?**

These sites require rezoning to prepare them for residential development. Other sites are either already zoned appropriately or are moving through the process toward a rezoning application.

- 5. How was the land use zoning on the Lymburn surplus school site changed from AGU on Jan 1, 2024 to FD without any resident consultation or communication?**

The zoning changed from AGU to FD as a result of the new Edmonton Zoning Bylaw 20001 taking effect on January 1, 2024. Bylaw 21001, which was the City-wide Rezoning Bylaw, was approved by City Council in October 2023, was advertised and consulted on numerous times over the project's duration. The new FD Zone was identified as the closest equivalent to the AGU Zone under the current zoning bylaw.

- 6. Is the City and council aware of the recent May 28, 2024 article in the Edmonton Sun by Lorne Gunter entitled "City Hall being sneaky with district plans that would force developments on neighbourhoods"?**

Thank you for sharing the article. Administration cannot speak for Council.

- 7. Why would the City submit an application to amend the land use zoning on this surplus school site to accommodate a four storey government subsidized rental project improvement at this location?**

The City is preparing this site for affordable housing development, as directed by policy C583A, which provides Council's direction for the development of the 2009 surplus school sites. Submitting a rezoning application is the first step in that process.

- 8. Why was the first City rezoning & development intent information letter received by only a small sampling of residents, through an un-addressed, "Dear Neighbour" communique' letter dropped in mailboxes circulated on May 4, 2024? Why didn't the City distribute letters to all neighbourhood residents?**

The Housing Action Team sent a letter to residents within a 120 metre radius of the development site in April 2024 to provide information about the project status and advanced notice that a rezoning application was going to be submitted. This is not a regulatory requirement but a practice of the Housing Action Team. The radius was selected to align with the rezoning notification.

The rezoning application was submitted in late April, which triggered the need to notify residents with a subsequent letter in May 2024. The Municipal Government Act, which sets the standard for rezoning

notices for all municipalities throughout Alberta, stipulates that residents within 60.0 m of the rezoning site need to be notified, and this is also reflected in the Edmonton Zoning Bylaw 20001.

Administration's approach for Lymburn and all other surplus school sites involved in the 2024 rezoning for surplus school sites was to double this requirement, notifying residents within 120.0 m, capturing a broader area of residents.

Both letters and any future mailouts can be found under the Lymburn section of the affordable housing developments webpage: [edmonton.ca/HousingDevelopments](http://edmonton.ca/HousingDevelopments)

**9. What process did the City use to obtain the personal names and addresses for the May 14, 2024 letter mailed? Why didn't The City utilize their ability to reach all residents by simply inserting copies of the May 14 letter within the property tax notices, which all residents received the last week of May 2024?**

The City uses information pulled from Alberta Land Titles to obtain the personal names and addresses. All this information is kept private and not shared with anyone outside City Administration.

See the above answer as to why not every resident was notified. Waiting until the property tax notices were sent out would have been too late for effective engagement.

**10. Why did the new City sign "Share your feedback" placed on the corner of 72 Avenue and 184 Street May 28, 2024, the day after feedback was to begin, make no mention of the Engaged Edmonton site?**

The sign placed on the corner of 72 Avenue NW and 184 Street is a requirement of the Edmonton Zoning Bylaw 20001 and Municipal Government Act, requiring a rezoning of this nature to have a rezoning information sign.

Located on the sign is information such as the site address, current and proposed zones, city staff contact information as well as applicant contact information. All of which are standard for the rezoning information sign.

Also located on the sign is a City of Edmonton website and a QR code, both giving access to additional information including the URL to the Engaged Edmonton site.

**11. Are any other uses being considered for the Lymburn surplus school site, such as: being retained by the city as park space for school, community league and residents recreational purposes or for seniors affordable housing?**

As part of the rezoning application, a rezoning from Future Urban Development Zone (FD) to Parks and Services Zone (PS) is also included to retain a portion of the area for park use.

City Council designated the Lymburn surplus school site for affordable housing. The City will consider any proposal for affordable housing development, including affordable housing for seniors.

**12. Will Lymburn residents be able to review the traffic impact report? Without the development completed, how can a proper traffic impact study be prepared?**

Once the Transportation Impact Assessment (TIA) is reviewed by City Administration, it will be made available on the Engaged Edmonton website.

TIAs are technical reports completed by Professional Engineers who analyze the multimodal traffic and safety implications of proposed developments. The TIA includes examinations of the existing infrastructure and traffic conditions, estimates the anticipated traffic generation of the proposed development, and then outlines recommendations for any traffic mitigation measures required to accommodate the increase in traffic or to address safety concerns. For more information on the City's transportation guidelines, please see the website at <https://edmonton.ca/tia>.

**13. Why then does the City of Edmonton Assessment Department within their 2024 Assessment Methodology residential improved properties (1 to 3 units) consider it to be a negative to property value?**

The Assessment and Taxation Branch makes use of the average annual weekday traffic count numbers in order to determine the appropriate magnitude of the traffic influence within their models.

**14. The City of Edmonton identified in attachment 3 of its C583A policy “developing surplus school sites”, that the current ratio of affordable housing within the Lymburn neighbourhood is 1.74%. Last night the ratio mentioned was 2%. How is this ratio determined? What criteria is the ratio based on?**

The ratio is calculated by dividing the total non-market housing units (social, near market, seniors and supportive housing excluding shelter units) by the total dwelling counts from the federal census counts of dwelling units in the neighbourhood. While the total number of non-market/affordable housing units is updated regularly, the dwelling counts are based on data from the federal census.

**15. As the last information was 2018, where can residents view all neighbourhoods “current” affordable housing ratios, not just the neighbourhoods identified with surplus school sites in them?**

The City has collected data on affordable housing supply in this interactive dashboard. Specifically, there is a map that shows known affordable housing by neighbourhood (Housing Supply Tab, Affordable Housing by Units map). The ratios will be added to the dashboard when the data is confirmed for each Neighbourhood.

**16. From City of Edmonton data; identified above, Lymburn, as a result of prior council and administration rezoning land use changes already has the highest density of dwelling units per hectare in comparison with other West end neighbourhoods within close proximity.**

**We don't need another multi residential building within the neighbourhood. Why would the City want to add Affordable Housing to an area that has a higher than average density?**

Using City-owned land is one of the most effective tools the City has to increase the supply of affordable housing. The surplus school site in Lymburn has been designated for affordable housing since 2015.

Additional density is required in all neighbourhoods to accommodate Edmonton's growing population and achieve the City Plan goal of creating 50% of net new housing units through infill development.

**17. Once all comments are gathered from residents after the City June 9, 2024**

**identified cut off, will all residents receive a copy or be able to view the “what we heard” report that then is prepared by administration prior to it being forwarded to council? What is the anticipated date of that report?**

At this time there is no set public hearing date, and therefore the timing of the What We Heard Report is unknown.

When the What We Heard Report is available, it will be shared in advance of the public hearing with any participant who reached out directly to the file planner or Affordable Housing Action team by email, or who provided their contact information on the Engaged Edmonton website. In addition, the complete public hearing package, including the What We Heard Report, Planning Report and other supporting documents will be posted on the City Council Public Hearing agenda website approximately 3 weeks in advance of the hearing date.

**18. Thanks again for the additional information, I still don't understand why in 2009 the Lymburn surplus school site was not afforded the same process concerning making a decisions through a circulation process, in which City departments and external partners, such as other school boards, reviewed available land assets for other development uses such as seniors housing or the first place program.**

The site was circulated with the rest of the 2009 sites to determine if other uses were required. Some sites were identified for seniors housing based on interest from developers, however, only one was built. Historically, the remaining sites have not had interest from seniors housing developers. Moving forward, we would consider proposals for any of the sites from seniors housing providers.

**19. You have identified, studies were undertaken to confirm feasibility, including environmental, servicing, transportation and traffic impacts. Is it possible to see the results and dates of these studies?**

A summary of the key findings of these reviews will be included in the report to Council.

**20. Was consideration ever given, by the Planning Department, to review the location of these surplus sites in terms of being homogeneous with other types of developments in close proximity or was a study ever performed to see how potential zoning and proposed multi storey apartments construction would conform with other developments adjacent or surrounding these surplus sites?**

Planning Coordination conducts a land use review for all rezoning applications to determine whether the proposed zone is appropriate in each context. This includes an examination of the surrounding land uses and policy direction within The City Plan.

**21. Why the change in zoning bylaw to allow the construction of a 4 storey apartment, within the middle of a single family neighbourhood, not along an arterial road, instead to allow developers to build them anywhere. Isn't this an entire contradiction to past zoning bylaws and land use conformity? In the past, a potential development of this type, in this location, would have definitely required a development appeal review board hearing and likely would not have had success. Concerned citizens in the past would have been able to exercise their democratic rights to file objections, what's changed concerning transparency and the rules of natural justice in this City.**



The Housing Action Team is proposing development up to four storeys based on its location on a collector road, the site fronting both a street and an avenue, and the adjacency to open space. For the Lymburn neighbourhood there is not a Plan in Effect that identifies the forms of development. The proposed RM h16 zone is considered compatible with the RS zone and is sometimes found on the next door lot. In this case, there are not only setbacks on each private lot, but also a separation which includes the road and its right of way, further minimizing its impact.

The Subdivision and Development Appeal Board (SDAB) would not be applicable in this instance as Administration does not render a decision on the application merely a recommendation. The decision rests with City Council.

Public engagement was held online last month and you are still able to provide your comments to the file planner, Luke Cormier. A summary of feedback will be collected in the What We Heard report presented to Council, which will make its decision on the application in a Public Hearing this fall. No date has been scheduled but we will share the information when it is available.

**22. The sign that was erected upon the Lymburn surplus school site, so many years ago I can't remember, but I'm sure the City would have that date, made no mention of the designation as "Affordable Housing". The sign simply identified future residential uses. As the sign was there during the same period that the first place program and seniors residences were commonly being talked about, why wouldn't these same considerations have been made available for the Lymburn site are they not residential uses?**

The First Place program made use of surplus school sites received by the City in 2006. The surplus school sites received in 2009 were designated for affordable housing, with some exceptions approved by Council that we've outlined in previous responses.

**23. It sounds like the Lymburn site ended up, by default, being designated for Affordable Housing. This designation was first identified on the new City sign, placed upon the site May 28, 2024, some 15 years after the site had been received by the City as a surplus school site in 2009.**

The City has been intending to develop the site for affordable housing since it was initially identified for that use; however, lack of funding did not allow for the development of the site in a timely manner.

**24. Fast forward to 2024, and the potential for seniors affordable housing would now seem to once again be a realistic development choice given the high cost of taxation, inflation, food prices, shelter, and high interest rates etc.**

As we've mentioned in previous responses, proposals for affordable seniors housing will be considered along with any other proposals for affordable housing.

**25. Our concerned citizen group, hope to again engage with the City in the not too distant future to offer a potential win-win solution to this adversarial position that we have been placed in by the current City of Edmonton council and administration.**

The planner on the rezoning application is still able to receive feedback on the land use application, which will be part of a package presented to City Council for its consideration. Council will make a decision on the application at Public Hearing this fall.

The City will require that the developer undertake public engagement with the community. The future developer will be in the best position to answer questions about built form and work with the community to find areas of collaboration.

**26. What is the maximum density for the RM h16 site of 1.4 hectares? How many dwelling units per hectare? What exactly is your team proposing for the zoning maximum dwelling units per hectare to be built on this 1.4 hectare site?**

There is no maximum for the proposed RM h16 site. The zoning bylaw only dictates the minimum density of 45 dwellings per net residential hectare (which equates to a minimum 63 units for the 1.4 hectare site).

The exact number of units will be determined at the Development Permit stage when a developer applies for one. The developer will need to meet the regulations of the RM h16 Zone, including height requirements, setbacks and must meet the minimum density requirements and so forth.

**27. Do residents get to see the Administration's What We Heard Report before it's sent to Council?**

Residents will get to see the What We Heard Report before it's sent to Council. Once complete, the File Planner will send it to all residents who provided an email address on the Lymburn Engaged Edmonton Website or who emailed the File Planner directly.

**28. Our Lymburn citizens group previously emailed Luke Cormier August 9, 2024 with a potential resolution, (identified as option 2), to our residents' identified objections and concerns about the current development site and rezoning. In order for this redevelopment site relocation to potentially happen, we would need the Real Estate Branch, Housing Action Team (Housing Branch) to agree to rescind its current rezoning application of April 16, 2024 from FD to RMh16.**

**The Planning Department can also take the position of "non-support" of the current rezoning application. If the planning department will support this alternative redevelopment citizen offered option 2, members of council may potentially agree.**

**We understand that two westend surplus school development sites have already been relocated from their original locations. These two sites are within the neighbourhoods of Summerlea and Wedgewood.**

**We would appreciate hearing from you concerning if your department will support our identified option 2 for the mutual benefit of both the City and our residents.**

Thank you for reaching out and providing the Lymburn Citizen Group Dispute Resolution Choices document.

Planning coordination has worked with the Housing Action Team on this response and understands that they previously evaluated the alternative location, adjacent to the residential development on the northeast side of the open space. The alternative location is not optimal, as it would not have as much street frontage as the proposed location, which would result in more dwellings fronting onto the park instead of the streets. Furthermore, it would impact existing sports fields, school outdoor space and mature trees.

City administration has now completed its review of the rezoning application submitted. Based on city policy considerations, technical analysis and public feedback, administration will be moving forward with a recommendation of support for this land use application. We recognize the Lymburn community's concerns, all of which have been captured in the What We Heard Report (still being finalized) which will be provided to City Council for their information prior to the Public Hearing, which is tentatively scheduled for October 21. Residents living within 120 metres of the site will receive a notice in the mail about two weeks prior to the Public Hearing with information about the date, how to register to speak, and where to direct additional questions and comments. This information will also be shared by the Housing team through its digital mailing list, which you can sign up for [here](#), and on its webpage: [edmonton.ca/HousingDevelopments](http://edmonton.ca/HousingDevelopments).

Thank you for your continued interest and involvement.

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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 property owners 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:

Luke Cormier, Planner  
780-496-7370  
[luke.cormier@edmonton.ca](mailto:luke.cormier@edmonton.ca)

Appendix A - Lymburn Citizen Group Dispute Resolution Choices

## **Lymburn Citizen Group Dispute Resolution Choices:**

On July 10, 2024 our Lymburn Citizens Group, met to discuss the City identified rezoning application and development intentions for the Lymburn Surplus School Site. From that meeting, our citizen group explored a number of development choices which were shared with all our citizen group members through Facebook and email. The results from respondents choices are identified below.

### **1st Choice. 100% of respondents voted in favour of this choice.**

Our Lymburn Citizens Group request that the City **cancel its April 16th rezoning application** concerning the Lymburn surplus school site, legally described as Plan 8321754 Block 42 Lot 60, municipal address 7204 - 184 Street NW. We request that, **this site be retained as park space by the City of Edmonton**, and it's title be caveated, so its current use as park space would continue into perpetuity. It would then continue to serve for existing school activities, citywide community league sports, frisbee football, cross country skiing, and other recreational activities for the enjoyment of all residents both within and outside the neighbourhood.

### **2nd Choice. 83% of respondents voted in favour of this choice.**

In the event that City Council will not agree to leave the surplus school site as park space, our Lymburn citizen group, request the following;

That the City as owners of all lots, legally described as Plan 8321754 Block 42 Lots 58, 59 and 61MR, (directly to the north of the current surplus school site) **re-subdivide these lots** to create a 1.4 hectare parcel for any future proposed affordable housing development.

Then the City make application to **rezone this new site, from PS to RSMh12**, and **relocate the affordable housing site** to the **northeast corner** of the existing park space. This would place any future affordable housing development adjacent to an already existing privately owned row housing rental complex (Lymburn Place), currently zoned RSMh12, located at 18415-75 Avenue NW, and legally described as Plan 8321698 Block 42 Lot 56.

We are aware that the City has previously agreed to relocate developments on two affordable housing surplus school sites within the neighbourhoods of **Summerlea and Wedgewood**.

The City or developer would then **construct a road** to this site, west of 184 Street, creating 73A Avenue NW, which would then provide access / egress along the north side of the new site. Additional access / egress would also be provided to the site along the east side from 184 Street.

In addition our citizen group request that the City/developer then **utilize the 1.15 hectare PS zoned land area**, previously identified in their application of April 16th, as an additional buffer or setback along the west side of 184 Street.

This PS zoned park space would be landscaped and treed, so current residents located along the east side of 184 Street, north of 73 Avenue, would be provided a landscaped green park space with trees to view when looking west towards any future development.



The majority of residents along 72 Avenue, west of 184 Street, facing north, would continue to view park space, as well as the majority of residents facing west along 184 Street, north of 72 Avenue.

The corner at 184 Street and 72 Avenue would become less of a health and safety concern for parents of school children, residents, and sports enthusiasts when crossing the intersection at 184 Street and 72 Avenue.

This RSMh12 land use zoning will efficiently add density to the Lymburn neighbourhood, while maintaining a more compatible land use with surrounding existing single family homes and limit any development to a lower building height.

Our citizens group also encourage, that under the affordable housing designation, the current Building Housing development program choice for an affordable subsidized rental development for seniors living be given the highest consideration for development for this site.

This development type would provide Lymburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing.

**3rd Choice. Less than 9% of respondents voted in favour of this choice, while a small number, 4%, picked no 3rd choice or 4 as 3rd choice 4%.**

In the event that City Council will not agree to leave the surplus school site as park space, our Lymburn citizen group, **request the following**; that the existing City RMH16 zoning **application** of April 16, 2024 **be cancelled** and a **new application** be made to reflect a land use zoning of **RSMh12 Scale Transitional Residential Zone and PS.**

**Utilize the 1.15 hectare PS zoned parcel**, (identified in prior application) **for future park space only**, to provide an additional set back along both 72 Ave and 184 street, instead of along the prior application described western boundary of lot 60.

This RSMh12 land use zoning will efficiently add density to the Lymburn neighbourhood, while maintaining a more compatible land use with surrounding existing single family homes and limit any development to a lower 12 metre building height.

Our citizens group also encourage, that under the affordable housing designation, the current Building Housing development program choice for an affordable rental development for seniors living be given the highest consideration for development for this site. This development type would provide Lymburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing.

**4th Choice. 4% of respondents voted in favour of this choice.**

Our Lymburn citizens group request that the existing City zoning application of April 16, 2024 be cancelled. Then a new application be made by the City Real Estate Branch to rezone Plan 8321754 Block 42 Lot 60 to **RSMh12 Scale Transitional Residential Zone and PS.**

The City would continue to utilize the existing surplus school site with the **restriction that developers could only construct row housing with a two storey maximum height along the peripheral of the site, along both 72 Ave and 184 Street, and then construct a maximum 3 storey height multi residential development behind the row housing.**

Then the City utilize the additional **1.15 hectare PS zoned parcel, for future park space only, to provide an additional set back along both 72 Ave and 184 Street, instead of just along the prior described western boundary of lot 60.**

Our citizens group also encourage, that under the affordable housing designation, the current Building Housing development program choice for an affordable subsidized rental development for seniors living be given the highest consideration for development for this site.

This development type would provide Lymburn neighbourhood seniors with the ability to continue to remain within their neighbourhood when downsizing.

**Our Citizen Group Conclusion:**

Lymburn already has the highest density at 25 total dwelling units per hectare, compared to other Westend neighbourhoods within close proximity. Our 2024 single family home assessment values are lower than the 2024 average citywide median. Our neighbourhood affordable ratio is identified as 1.74%, less than or similar to the vast majority of citywide neighbourhood ratios citywide which were identified as 0 to 5% by the City within their 2018 report.

Based upon the below information our citizen group have complied, reviewed and identified, we encourage our City Council to consider the development choices we have provided for development of our surplus school site. It would provide a much more equitable treatment for the citizens and taxpayers of Lymburn in terms of adding density to our neighbourhood.

Our Lymburn citizen group feel that by City Council agreeing to either our 1st or 2nd highest rated choice, it would be a compromise which would benefit our neighbourhood citizens /taxpayers while still supporting City Councils affordable housing initiative.

Respectfully Submitted,

Lymburn Citizen Group

## **Citizen objections to current City rezoning and development intentions:**

Our Lymburn citizen group, object to the City of Edmonton's, April 16, 2024 rezoning application "506812029-002" to rezone the current designated surplus school site located at 7204 - 184 Street NW from FD to RMh16 and PS. The legal description of the surplus school site site; Plan 8321754 Block 42 Lot 60. Tax account 1283910. Total lot size 2.55 hectares.

We object to the City plan to subdivide Lot 60 into a **1.4** hectare parcel and rezone it from FD to RMh16 for the development of a 4 storey multi residential rental apartment or row housing complex for subsidized "Affordable Housing" with a minimum density of 45 dwelling units per hectare. The Lymburn surplus school site is situated within the middle of single story residential homes, a development with a 16 metre story height will neither conform nor be harmonious with existing single family homes. This type of intended development belongs situated along the frontage of major roads, such as 178 Street or 69 Avenue east of 172 Street.

We object to the City plan to use the remaining **1.15** hectares, for any use but park space, with the rezone from FD to PS, it can allow for the development on parkland that is intended to serve educational, recreational, and community needs at the city-wide, district, and neighbourhood level. This zoning will also accommodate the development of community use improvements to a maximum storey height of 16 metres.

Under RMh16 zoning, the minimum density will increase by a minimum of 63 units. The Lymburn neighbourhood dwelling unit density is currently higher than other Westend neighbourhoods within close proximity. Our citizens object to the current City rezoning and development option, our residents do not want this added density this type of development would bring and place on existing infrastructure within our neighbourhood.

Parents of school aged children have safety concerns, given the transient tenancy this type of development would bring and object to it being located adjacent to the elementary school.

Concerns were expressed about the development impact on enrolment issues and overcrowding at the Lymburn public elementary school. The elementary school, opened in 1984, with an enrolment of 292 students and 28 staff. The current 2024 school profile identifies an enrolment of 420 students, with 33 full and part time staff.

Additional traffic and parking congestion concerns were expressed along 184 Street and 72 Avenue. Parking already spills into neighbourhood streets and avenues around the park site during sporting events and school drop off and pickup. Traffic issues along 184 Street north of 69 Avenue has already been identified by numerous residents to both police and the City "Vision Zero" team as having a frequent speeding problem, as drivers shortcut through the neighbourhood.

The development of a proposed government subsidized, non-market, low income transient rental housing infill development will also create higher crime incidents within the neighbourhood.

Citizens expressed concern with the loss in property values due this type of development within the middle of the neighbourhood. The City Assessment Department currently acknowledge a moderate negative impact on home values located adjacent to large multi residential or row housing rental unit properties.

A number of citizens purchased homes within the neighbourhood because of the location, facing the green space, only now to be negatively impacted by this city proposed zoning and potential development.

Citizens are concerned about the loss of our existing recreational space, which currently is being actively used by both neighbourhood and citywide residents for recreational and sporting activities. Once developed this space can never be replaced.

## **Lymburn Surplus School Site History:**

The Lymburn site, situated on the SE corner of 72 Avenue and 184 Street NW, originally was to have been developed as a **public junior high school in the late 1980's**. Years later, in **October, 2009**, Edmonton Public Schools, recommended to Board Trustees to declare the site as surplus and turn ownership over to the City of Edmonton. The public junior high school site location was then relocated to the SE corner of 57 Avenue and 184 Street NW, where in 1991, S. Bruce Smith Junior High School was opened. Unfortunately, junior high school children from our Lymburn neighbourhood weren't able to attend, as they fell outside of S. Bruce Smith's closed boundaries. The school boundary ended south of 69 Avenue, Lymburn neighbourhood boundary begins north of 69 Avenue.

After being declared surplus, the site in question, has remained vacant for decades and has been continuously used since by residents, both within and outside the neighbourhood, for recreational activities.

**In 2015**, Edmonton City Council designated the Lymburn surplus school to be developed as "Affordable Housing". After numerous citizen requests to view the documentation and studies to understand how Lymburn became designated for affordable housing by council, **no documentation has been provided as to what criteria and which studies were utilized in designating the Lymburn surplus school site for "Affordable Housing"**.

The surplus school site land use zoning was originally **AGU**. This zoning provided the opportunity for agricultural and rural land use activities and a limited range of other uses that would not impact future development of the land. It remained zoned as AGU, until the end of **2023**. City Council approved the new citywide Zoning Bylaw 20001, which took effect on January 1, 2024, and this amended the zoning from AGU to **FD** "Future Urban Development Zone".

In April 2024, the **City of Edmonton** received a rezoning application, from the **City of Edmonton Real Estate Branch**, on behalf of the **City of Edmonton Housing Action Team**. The application number was identified as 506812029-002. File LDA24-0148 and created April 16, 2024.

Given the extended time that has passed since 2009, and the numerous city policy changes and reports concerning surplus school site development, City Council should agree to review their past 2009 Affordable Housing surplus site designation decision process.

Within all past City administration policies, beginning with the "2005 Edmonton Cornerstone Program for Affordable Housing" and from review of prior surplus school site citizen impact feedback "What We Heard Reports", there appears to be a current theme "better community engagement". The City Administration identifies that they need to better engage with communities to set the stage for positive community outcomes.

This has definitely not been the case with our Lymburn citizens. Perhaps the City could benefit by practising a more effective listening strategy when reviewing and responding to the concerned citizens who live and pay taxes within these neighbourhoods versus just other government agencies?

The Lyburn surplus school site has sat vacant since the mid 1980's, it had been declared surplus by the school board in 2009 and designated by council for Affordable Housing in 2015.

Then 9 years later, May 17, 2024, a small sampling of impacted citizens received notification letters outlining the City intentions to rezone and develop the site. Citizens were provided a 14 day window to provide feedback comments by June 9, 2024. As just a small sampling of citizens (within 120 metres) supposedly were sent the notification letter, an extension was requested so citizens could spread the word and additional neighbourhood citizens could be made aware and provide their feedback. Unfortunately no extension was granted.

A number of our neighbourhood senior citizens expressed concern while attempting to utilize the city administration "engaged Edmonton website". Another request was made of the City to just provide an email address to allow citizens to forward their comments and that the City would then add these comments to the engaged website for all citizens to view. The City did provide an email address.

During the feedback period May 27th to June 9, citizens were advised (although an in person meeting had been requested) by councillor Hamilton's office, a virtual meeting was to be held, on June 4, 2024. Attendees were also advised that in the event of an Oiler game being scheduled, it would be broadcast during that meeting.

We were advised, that the City doesn't hold in person meetings anymore. Then we find out that councillor Andrew Knack hosted an in person surplus school site meeting for La Perle neighbourhood citizens on July 11, 2024.

This whole rushed communication process, after this site has sat vacant since the mid 1980's, has left our citizens feeling we are neither being listened too or being heard. The process appears to be simply just a regimented timeline of events for city administration with no intention by our council or administration to improve on a better community engagement process with its citizens.

All citizens share the city philosophy that all people deserve to live in a safe an affordable home. Coupled with that desire should also come some responsibility for any city policy benefactor to contribute to securing that dream. Habitat for Humanity uses a process where people may use sweat equity to help secure that dream. This allows potential residents the ability to contribute to that dream while also taking pride and showing respect for that home and the future community they then will live in.

Securing funding from the Federal Home Accelerator Program, should not be the sole driving factor for expediting construction of these developments on surplus schools sites in mature neighbourhoods. These developments, which from review of impacted citizen responses citywide, in "What we Heard Reports" are negatively impacting tax paying citizens who have also had to make sacrifices in order to have been able to have secured that dream of a safe affordable home.



## Lymburn Citizen City Communication Process Review:

Lymburn citizens had requested the City provide them with the criteria, analysis and studies which were completed in order to designate the 2009 declared Lymburn surplus school site as “Affordable Housing” in 2015. As no detail was received, our citizen group began reviewing a couple of 2015 identified surplus school sites where the City had yet to decide future uses.

Two surplus school sites were chosen in an attempt to review the consistency in communication process utilized by the City concerning their surplus school site development policy. Our review of two 2015 surplus school sites, Ozerna and Oleskiw identified a significant variance by the City in terms of the communication process utilized when seeking feedback from impacted residents concerning rezoning and building options. This was significantly different than what was afforded our Lymburn neighbourhood citizens.

Within both identified neighbourhood “What We Heard Reports”, were significant differences in communication process utilized by the City in contrast to the communication provided Lymburn citizens. Although both neighbourhood reports identify similar variances, the Oleskiw neighbourhood, was chosen to illustrate these differences due to its closer proximity to Lymburn. Comments provided below identify these variances by the City within their communication processes between both neighbourhoods.

City Administration mailed 1,347 Postcards to all Oleskiw residents through Canada Post, notifying them of the upcoming online engagement. Lymburn residents were provided notification letters concerning online engagement only if they were within an identified radius of 120 metres of the surplus school site.

An online engagement was hosted on the Engaged Edmonton website, [www.engaged.edmonton.ca/Oleskiw](http://www.engaged.edmonton.ca/Oleskiw), from February 16, 2021 to March 16, 2021 (30 days). Lymburn residents were given from May 27, 2024 to June 9, 2024 (14 days) in which to provide their feedback comments to the [www.engaged.edmonton.ca/Lymburn](http://www.engaged.edmonton.ca/Lymburn) site. Extensions were requested, none were granted.

Details on the history of the Oleskiw surplus school site, proposed zoning options, site photos and a property map were provided. A survey was linked on the [engaged.edmonton.ca/Oleskiw](http://engaged.edmonton.ca/Oleskiw) web page asking which zone was preferred and why? A question and answer section was also published on the website. In order to provide feedback on the surplus school site webpage, participants were required to create and register a profile with Engaged Edmonton and provide a username and their postal code.

In contrast, no survey was provided to Lymburn citizens, offering zoning options or development options. Only a small sampling of Lymburn citizens (within 120 metres) received mailed letters from the City Urban Planning and Economy Development Services identifying City intentions to amend the current land use zoning from FD to a PS & RMh16. It also identified the maximum allowable storey height, and minimum permitted dwelling unit density. No other zoning option preferences were provided to Lymburn residents.

Participation for the Oleskiw surplus school site engagement has been high and, as a result, City Administration has a clear understanding of the community concerns. City Administration will continue its review of the Oleskiw surplus school site. The information gathered through this engagement will inform additional work to be completed that will assist in determining appropriate future use of the site. The City will seek to balance the concerns of the community with its ongoing efforts to achieve the strategic goals of ConnectEdmonton and The City Plan.

The City choose to utilize Canada Post to deliver notifications by postcard to every resident within the Oleskiw neighbourhood boundary inviting them to participate in the online public engagement. In contrast, Lymburn citizens were not afforded this same engagement process. The online feedback engagement process was not provided to all neighbourhood citizens, but supposedly only to citizens located within 120 metres of the surplus school site.

However, when Lymburn neighbourhood citizens were canvassed, within close proximity to the surplus site, many citizens identified that they had received no notification and were unaware of the City's intentions concerning rezoning and potential development of the surplus school site.

Lymburn citizens identified concerns with the City Urban Planning and Economy Development Services decision, to just include notification letters to citizens within a 120 metre distance, perhaps City administration should review other civic departmental distribution communication processes to develop a more consistent process. Recently Lymburn citizens received a construction bulletin concerning overland drainage work being conducted within our neighbouring community to the south, Ormsby Place. Surely if citizens could receive city communication concerning issues not directly impacting directly them, the area for communication should be expanded to all neighbourhood citizens regarding issues which actually do impact them.

Our Lymburn citizen group requested on several occasions, that the City identify its rezoning and development intentions to all neighbourhood citizens. This item should have been a priority issue for the City administration, because a government subsidized affordable rental multi residential complex is to be located adjacent to an existing public elementary school. Surely this issue would impact all neighbourhood parents of school aged children and not just simply residents within a 120 metre government allocated area? This proximity issue should be a more prominent variable of consideration within any city administration impact study due to potential safety concerns.

Had the City chosen to provide, all Lymburn neighbourhood residents, with the same communication processes it had provided the Oleskiw residents, then likely the Lymburn surplus school site engagement process would have received a much higher comment response rate, to allow the City Administration to form a much clearer understanding of our neighbourhood citizen concerns and wishes.

#### Recommendations by the City Real Estate Housing Branch concerning the Oleskiw neighbourhood identified City surplus site zoning and future development;

City Administration has reviewed the surrounding land uses, existing City policies, statutory plans, and available market information to determine a suitable land use that helps Edmonton reach its strategic goals and is compatible with the existing neighbourhood. Development of the site for medium density residential uses supports Edmonton's Strategic Plan, The City Plan, and Reimagine goals for supporting infill development, providing a variety of housing types, and management of surplus land.

For this engagement, the project team recommendation was to rezone the site to the Row Housing (RF5) zone, to efficiently add density to the neighbourhood, while maintaining a more compatible land use with the existing single family houses and limiting development to a lower building height.

The City's Real Estate branch is looking to submit a land development application to rezone the surplus school site in Oleskiw to a residential use. Before submitting the application, we wanted to hear community thoughts on the rezoning options. Feedback has been received through this engagement process and will be considered for selecting an appropriate zone for this site. The three zones being suggested were Residential Mixed Dwelling Zone (RMD), Row Housing Zone (RF5), and Low Rise Apartment Zone (RA7), along with "other" and "none" options for citizens to provide their input.

The opulent status of any identified neighbourhood should not be a deciding factor within implementation of the City C583A surplus school site development administration policy decision making process. Council has been provided funding through both the Federal Housing Accelerator and the Affordable Provincial Housing Partnership Program to create affordable housing, treat all neighbourhoods equally.

Our Lymburn citizen group feel, from our review of city administration communication process review, we have not been afforded the same communication and review process as provided citizens in neighbourhoods where surplus school sites were not yet designated for “Affordable Housing”.

We feel all surplus school sites under the City surplus school development policy should be applied equitably with the same consistent communication process!

It appears from our review, that the 2009 council designated “affordable housing” surplus school sites have definitely not been provided this same communication courtesy.

## **Citizen Review of Citywide Neighbourhood Affordability Ratios:**

In 2018, the City of Edmonton administration created a report CR-5073, identifying all citywide neighbourhoods affordable housing ratios. The majority of neighbourhoods throughout the city identified below fell within the range of 0% to 5%.

**0-5%** Albany, Aldergrove, Allard, Allendale, Ambleside, Argyll, Aspen Gardens, Athlone, Avonmore, Beacon Heights, Bearspaw, Beaumaris, Belgravia, Belle Rive, Bellevue, Bisset, Blackburne, Blue Quill, Blue Quill Estates, Breckenridge Greens, Brintnell, Brookside, Bulyea Heights, Callaghan, Callingwood North, Callingwood South, Cameron Heights, Canossa, Capilano, Carlton, Carter Crest, Chambery, Chappelle Area, Charlesworth, Clareview Town Centre, Cloverdale, Crawford Plains, Cromdale, Crystallina Nera West, Cumberland, Cy Becker, **Dechene**, Delton, Delwood, **Donsdale**, Dovercourt, Eaux Claires, Ebbers, Edgemont, Ellerslie, Elmwood Park, Elsinore, Empire Park, Evergreen, Falconer Heights, Forest Heights, Fraser, Fulton Place, **Gariepy**, Garneau, Glastonbury, Glengarry, Glenora, Glenridding, Gold Bar, Goodridge Corners, Grandview Heights, Granville, Graydon Hill, Greenfield, Greenview, Griesbach, Grovenor, Haddow, Hawks Ridge, Hays Ridge Area, Hazeldean, **Henderson Estates**, Heritage Valley Town Centre Area, High Park, Highlands, Hodgson, Hollick-Kenyon, Holyrood, Homesteader, Hudson, Inglewood, Jackson Heights, **Jamieson Place**, Jasper Park, Keheewin, Kenilworth, Kernohan, Keswick Area, Kilkeny, Killarney, King Edward Park, Kiniski Gardens, Kinokamau Plains Area, Klarvatten, Lago Lindo, Lansdowne, Larkspur, Lauderdale, Laurel, Laurier Heights, Leger, **Lymburn**, Lynnwood, Macewan, Mactaggart, Magrath Heights, Malmo Plains, Maple, Maple Ridge, Matt Berry, Mayfield, Mayliewan, Mcconachie Area, Mckernan, Mcleod, Meadowlark Park, Meyonohk, Mill Woods Town Centre, Miller, Minchau, Newton, North Glenora, Ogilvie Ridge, **Oleskiw**, Oliver, **Ormsby Place**, Overlanders, Oxford, **Ozerna**, Paisley, Parkallen, Parkview, Patricia Heights, Pembina, Pollard Meadows, Potter Greens, Prince Charles, Prince Rupert, Queen Mary Park, Quesnell Heights, Ramsay Heights, Rapperswill, Rhatigan Ridge, Richford, Rideau Park, Rio Terrace, Riverview Area, Rosenthal, Rossdale, Royal Gardens, Rural North East Horse Hill, Rural North East South Sturgeon, Rural South

East, Rural West Big Lake, Rutherford, Satoo, Schonsee, Secord, Sherbrooke, Silver Berry, Skyrattler, South Terwillegar, Starling, Stewart Greens, Strathcona, Suder Greens, Summerlea, Summerside, Sweet Grass, Tamarack, Tawa, Terra Losa, Terrace Heights, Terwillegar Towne, The Hamptons, Eilerslie, Thorncliff, Trumpeter Area, Twin Brooks, Walker, Webber Greens, **Wedgewood Heights**, Wellington, West Meadowlark Park, Westbrook Estates, Westmount, **Westridge**, Westview Village, Westwood, Wild Rose, Windermere, Windsor Park, York.

Under attachment 3, of the C583A, ( Developing Surplus School Sites ) policy review by Executive committee December 6, 2023, current affordability ratios were supposedly updated from 2018 for each of the 12 undeveloped 2009 affordable housing designated surplus school site neighbourhoods.

Interesting to note that a number of other current 2015 identified neighbourhood surplus school sites, (not designated as Affordable Housing), such as the “Oleskiw” neighbourhood, had no updated affordable housing neighbourhood ratio identified.

As, well the **Henderson Estates**, neighbourhood declared surplus school site in **2009 and designated as Affordable Housing**, located at 3408 Riverbed Road appears to have no current affordability ratio or any city identified development plan status. Is this potentially due to litigation?

Updated Affordability neighbourhood ratios were provided for two of the Westend neighbourhoods, designated for Affordable Housing, Wedgewood Heights with an affordable ratio of **0%** and Lymburn at **1.74%**.

**It would not seem uncommon, given the age demographic for most mature neighbourhoods, that when compared with new, redeveloping or transient neighbourhoods, that citizens would likely have a higher owner occupied status. Most long term resident senior home owners, likely would have no or low mortgage obligations. Why would the percentage of income paid by neighbourhood residents on housing be an attribute of consideration for the City to use as a reason for redevelopment of surplus school sites within these mature neighbourhoods?** Seniors within these mature neighbourhoods have worked hard all their lives and have contributed to social programs through various forms of government taxation. Why now, while in retirement, are these same citizens being stressed by the impact from the City affordable housing policy and housing program development options?

Unfortunately, currently no updated citywide affordable ratios by neighbourhood are available. The City Planning Department, has indicated that all affordable neighbourhood ratios will be updated once data is confirmed for each neighbourhood. It is difficult to believe that given the priority city council has placed upon its affordable housing initiative, these citywide neighbourhood affordable housing ratios are currently unavailable and have not been updated since 2018.

## Lymburn density comparison to other Westend neighbourhoods:

From city data; “City of Edmonton Dwelling Unit Density by Neighbourhood 2014” final report publication, in comparison with other close proximity west-end neighbourhoods, identified below, Lymburn has the **highest density of dwelling units per hectare**. Lymburn does not need the increased dwelling unit density from a rental, multi-res or row housing development within this neighbourhood.

In the mid 1980’s when interest rates were 18-20%, the City provided developers the ability to rezone large parcels within the neighbourhood from RF1 to RPL, RSL, and RF4. The result was smaller built homes on smaller lots, with increased density. These prior land use zoning changes have made homes within the Lymburn neighbourhood already very affordable.

### City 2014, “latest” identified dwelling units density per neighbourhood:

Neighbourhood Name	2014 Total Dwelling Units	Residential Hectares	2014 Dwelling unit density per Net Residential Hectare Area	2024 Single Family property count from City Assessment	2024 Single Family property count per Net Residential Area
<b>Lymburn</b>	2,200	89.1	<b>25</b>	1,509	17
Ormsby Place	1,940	84.8	<b>23</b>	1,038	12
Jamieson Place	1,333	66.7	<b>20</b>	1,251	19
**Wedgewood Heights	519	47.2	<b>11</b>	516	11
Oleskiw	1,103	86.2	<b>13</b>	907	11
Westridge	498	41.2	<b>12</b>	453	11
Gariepy	740	41.3	<b>18</b>	489	12
**Donsdale	577	41.6	<b>14</b>	387	9
Deschene	596	35.9	<b>17</b>	530	15

\*\* original dwelling units identified within Developing Growth Areas in 2014. The 2024 City of Edmonton Assessment Department provides an updated single family property count (1 to 3 units) for Wedgewood Heights of total 516 residential dwelling units. While the Donsdale 2014 dwelling units from Planning appear skewed, as it includes the Touchmark at Wedgewood retirement community, a 10.12 hectare parcel developed with independent living and supportive assisted living units. Updated single family property counts for Donsdale can be viewed below.

A subsidized affordable rental seniors development at this location, would also ease Wedgewood Heights concern about ability of tenants to contribute to HOA fees, as none would be required within Lymburn.

# The City of Edmonton “2024” Median Property Assessment per (Single Family) & (Condominiums & Townhouse)

Neighbourhood	Single Family Property Count	Single Family Median Assessment	Condominium & Townhomes Property Count	Condominiums & Townhomes Median Assessment
Lymburn	1,509	<b>\$368,500</b>	393	\$161,000
Ormsby Place	1,038	<b>\$441,500</b>	718	\$159,000
Jamieson Place	1,251	<b>\$423,000</b>	131	\$279,500
Wedgewood Heights	516	<b>\$544,250</b>	0	\$0
Oleskiw	907	<b>\$688,500</b>	87	\$568,000
Westridge	453	<b>\$583,500</b>	0	\$0
Gariepy	489	<b>\$525,500</b>	0	\$0
Donsdale	387	<b>\$738,500</b>	196	\$167,750
Deschene	530	<b>\$470,000</b>	67	\$375,500

The City Assessment Branch identified the 2024 median single family property assessment as **\$428,500, citywide**. The City identifies Lymburn, as a neighbourhood with 1,509 single family properties and having a median assessment of \$368,500.

Of the Westend neighbourhoods in close proximity identified above, Lymburn already appears to be the **most affordable** in terms of housing price.

## Our Citizen Group Conclusion:

Lymburn, already has the highest density at 25 total dwelling units per hectare, compared to other Westend neighbourhoods within close proximity. Our 2024 single family home assessment values are lower than the 2024 average citywide median. Our neighbourhood affordability ratio is identified as 1.74%, less than or similar to the vast majority of citywide neighbourhood ratios citywide which were identified as 0 to 5% by the City in their 2018 report.

Based on the above information our citizen group have compiled, reviewed and identified, we encourage our City Council to consider the development choices we have provided for development of our surplus school site. It would provide a much more equitable treatment for the citizens and taxpayers of Lymburn in terms of adding density to our neighbourhood.

Our Lymburn citizen group feel that by City Council agreeing to either our 1st or 2nd highest rated choice, it would be a compromise which would benefit our neighbourhood citizens /taxpayers while still supporting City Council’s affordable housing initiative.