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May 27, 2026

Stuart Carlyle
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City of Edmonton
6th Floor, Edmonton Tower
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RE: LDA25-0389 - Updated Cover Letter and Rezoning Rationale for Proposed Rezoning from (RS) Small Scale Residential Zone to (RM h23.0) Medium Scale Residential Zone - 9222, 9230, 9240, and 9244 - 116 Street NW, Windsor Park

Dear Stuart:

On behalf of Westrich Pacific Corp., Green Space Alliance (GSA Consulting Inc.) is pleased to submit this updated cover letter and revised Rezoning Rationale in support of the above-noted rezoning application. The application proposes to rezone four parcels municipally addressed as 9222, 9230, 9240, and 9244 - 116 Street NW from the (RS) Small Scale Residential Zone to the (RM h23.0) Medium Scale Residential Zone.

This updated submission responds to the City of Edmonton's land use advisements and to the revised District Policy framework applicable to Urban Mix areas. It should be read together with the revised Rezoning Rationale, which provides a more detailed assessment of the site's planning context, edge-of-node location, and suitability for additional scale under the RM h23.0 Zone.

Purpose of the Updated Submission

The purpose of this updated submission is to clarify the planning basis for the proposed RM h23.0 Zone in light of the City's technical circulation comments and the amended District Policy. The revised rationale focuses on the Land Use comments and, in particular, the relationship between the site's mid-block location, its proximity to the University-Garneau Major Node, and the supportive contextual factors identified in District Policy Section 2.5.2.5.

The proposed rezoning would enable medium-scale residential development of up to 23.0 m in height, subject to the regulations of the RM h23.0 Zone. The anticipated development concept remains approximately 150 dwellings, with final unit count, building design, parking supply, and detailed site configuration to be determined at the Development Permit stage.

Planning Context

The subject site is located on the west side of 116 Street NW, immediately across from the University of Alberta campus. The Scona District Plan identifies the University-Garneau area as a Major Node and designates the subject site as Urban Mix. The site therefore occupies a transitional location: it is outside, but immediately adjacent to, a major institutional node, and it interfaces with small-scale residential development to the west and south.

The City's land use comments recognize this edge condition and note that a 6-storey building at this location can provide an appropriate transition from the University Major Node. The comments also identify the

transition tools embedded in the RM h23.0 Zone, including interior side setbacks, increased upper-storey setbacks, rear setback requirements, maximum facade length, and a maximum Floor Area Ratio of 3.0.

District Policy Considerations

The revised Rezoning Rationale addresses the amended District Policy directly. District Policy Section 2.5.2.4 identifies circumstances where Low Rise development may be supported outside a Node and Corridor Area on sites along Arterial Roadways. The subject site is not a corner site and is not within 400 m of a Mass Transit Station. Accordingly, the application does not rely primarily on Section 2.5.2.4 as the determinative policy test for support.

Instead, the stronger policy basis for the application is Section 2.5.2.5, which allows Administration and Council to consider additional scale where supportive contextual factors are present. The revised Rezoning Rationale addresses each of the listed factors, including:

- appropriate site size to support the proposed scale;
- location and orientation of the site on the block;
- proximity to the University-Garneau Major Node;
- proximity to transit service and active transportation networks;
- design and function of adjacent roadways;
- proximity to parks, open space, and the river valley trail system; and
- the scale and uses permitted or present on adjacent sites, including the University of Alberta campus.

This approach avoids treating the absence of a corner condition as a prohibition. Instead, it evaluates the site on the full set of contextual factors contemplated by the District Policy.

Mid-Block Location and Site Suitability

The site's mid-block location has been considered carefully. A corner site can provide urban design advantages in some circumstances, particularly where gateway expression, enhanced visibility, or two-frontage activation is desired. However, those considerations should be distinguished from the broader planning question of whether additional scale is appropriate in this specific context.

For this application, the mid-block condition does not undermine the suitability of the RM h23.0 Zone. The site fronts onto 116 Street NW, a collector roadway, and vehicular access is proposed from the rear lane. This access configuration concentrates vehicle movements away from multiple street frontages, maintains the continuity of the residential block face, and supports traffic distribution toward the surrounding higher-order street network. The revised Mobility Assessment separately addresses transportation performance, access, and alley operations.

Density, FAR, and Development Flexibility

The RM h23.0 Zone regulates built form through height, Floor Area Ratio, setbacks, facade length, and other site and building regulations. It also establishes a minimum density. It does not establish a maximum dwelling density. As a result, the number of dwellings ultimately achieved on the site will be a function of FAR, unit mix, parking design, market conditions, and detailed architectural resolution at the Development Permit stage.

For rezoning purposes, the appropriate question is whether the RM h23.0 Zone provides a suitable built-form envelope for the site. In our opinion, it does. The zone permits a medium-scale residential form that is materially lower than the large institutional buildings on the east side of 116 Street, while providing a more meaningful transition than the existing RS zoning would allow.

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Technical Reports and Supporting Materials

The updated submission is supported by the revised Rezoning Rationale and the technical materials already submitted through the Land Development Application process. Transportation comments have been addressed through revisions to the Mobility Assessment, and drainage matters have been reviewed through the accepted Drainage Servicing Report process. Additional detailed matters, including final building design, landscaping, tree retention, waste management, parking, access design, and any required infrastructure upgrades, can be addressed through subsequent Development Permit review.

Enclosures

The following materials are submitted or remain on file in support of the application:

1. Updated Cover Letter
2. Revised Rezoning Rationale

Conclusion

The proposed RM h23.0 rezoning represents a reasonable and policy-supported response to the site's location at the edge of the University-Garneau Major Node. It supports additional housing in an established neighbourhood, contributes to City Plan growth objectives, and uses a standard residential zone with clear transition regulations rather than a Direct Control approach.

In our opinion, the revised Rezoning Rationale demonstrates that the proposal should be supported under the District Policy's contextual assessment framework for additional scale. The application does not depend on a corner-site condition; rather, it is justified by its site size, collector-road frontage, proximity to a Major Node, adjacency to large institutional development, access configuration, active transportation context, and ability to provide a medium-scale transition between the University of Alberta campus and the surrounding residential neighbourhood.

Thank you for your continued review of this application. Should you have any questions or require further information, please contact me at 780.860.3053 or by email at marcelo@greenspacealliance.com.

Respectfully submitted,

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Encl.