

REQUEST FOR DECISION

Subject: Residential Density



Presented to: Governance and Finance Committee

Date: November 29, 2023

Item #: 7.1

Submitted by: Dave Michaels, Manager,
Planning Services

ADMINISTRATIVE RECOMMENDATION

1. That the Governance and Finance Committee direct Administration to draft Land Use Bylaw amendments that standardize and simplify development regulations to create high, medium and low density scenarios which includes applying the same regulations for each density scenario to the existing Land Use Districts;
2. That the Governance and Finance Committee direct administration to include the removal of minimum and maximum dwelling size with any Land Use Bylaw amendments;
3. Direct administration to draft amendments to the Land Use Districts boundaries and their associated regulations for the RCN: Cougar North, RMR: Marmot/Rundle, RRA: Rainbow Avenue, RRF: River Front, RSA: Spray Avenue, RSC: Squirrel/Cougar, RTM: Tunnel Mountain and RVV: Valley View districts; and,
4. That the Governance and Finance Committee provide direction to Administration on which non-residential districts should be considered for rezoning, if any, to residential districts and direct administration to return with a report outlining which other land could be rezoned to comply with the Banff National Park Management Plan.

BACKGROUND

Reason for Report

This report is being brought forward to address two specific areas of direction:

1. Specific responses to Council Motions:

FIN23-102 Moved by Mayor DiManno

That the Governance and Finance Committee direct administration to return to a future meeting of the Governance and Finance Committee with a Text for Discussion Document for an amending bylaw to the Land Use Bylaw to remove single detached housing as a use.

MOTION CARRIED

FIN23-102 Moved by Mayor DiManno

That the Governance and Finance Committee direct administration to return to a future meeting of the Governance and Finance Committee with a report outlining options for creating a maximum dwelling unit size for all housing types.

MOTION CARRIED

2. Action one of the five initiatives outlined in the Housing Accelerator Fund Action Plan that was approved by Council at the June 26, 2023, meeting to undertake a full-scale review of the Land Use Bylaw as it relates to housing development including review of:
 - a. Zoning/Land Use - Explore changes to existing land use designation and density ratios such as the conversion of existing non-residential lands to residential lands, amendments to permitted and discretionary uses etc.

- b. Height allowances – explore options to increase height allowances for certain developments relative to the district they are in
- c. Floor Area Ratio (FAR) – explore options to increase existing FAR, either for all housing developments or targeted to specific types such as high density, affordable, etc.
- d. Setback requirements – explore potential reductions in setback requirements to allow for enhancing building potential for more housing
- e. Site Coverage – explore options for increasing site coverage possibilities
- f. Maximum Dwelling Size – explore options to establish a maximum dwelling size to ensure efficient use of land

Summary of Issue

The Land Use Bylaw is the most important of all municipal bylaws when it comes to shaping our community. It is the bylaw that sets out how buildings in Banff look and function. It includes regulations that both meet legislated requirements of higher-level documents, such as the *Town of Banff Incorporation Agreement*, the *Municipal Government Act*, and the *National Parks Act*, and forms the framework for development that meets the communities long range vision as set out in the *Banff Community Plan*, the *Banff National Park Management Plan* as well as other strategic documents.

There are number of regulations within the Land Use Bylaw that both allow, and limit, housing development in Banff. The last full-scale review of the Land Use Bylaw was completed in 2012 with some minor changes since that time.

Administration has broken this report into three sections for consideration:

- 1. Development Regulations;
- 2. Amending the Boundaries of Existing Residential Land Use Districts; and
- 3. Rezone non-residential districts to residential districts.

Background on Zoning and Districts

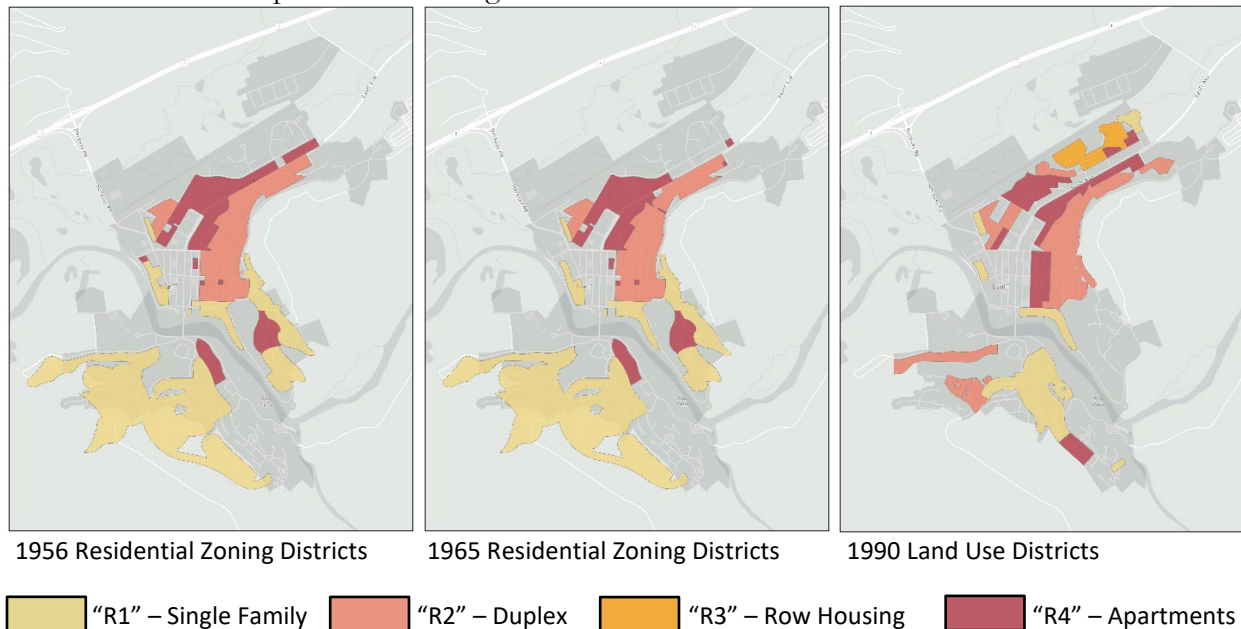
Within North America, planning and development regulations typically separate a community into different zones, or districts. This is intended to achieve particular land management objectives within specific areas, through limits to allowable uses and/or design restrictions.

With the introduction of the first Banff Townsite Zoning Regulations in 1956, Parks Canada established three zones that allowed for housing: *Class A Residential Zone* which allowed for Single detached housing; *Class B Residential Zone* which allowed for Single Detached and Semi-detached Housing; and, *Multiple Dwelling and Institutional Use* which allowed buildings containing multiple dwellings as well as limited non-residential buildings. The general philosophy on where the zones were located was that the higher density would be closer to the more developed areas where services and employment was located.

In 1966, the language changed to:

- R1 – Which allowed for One-family dwelling,
- R2 – Which allowed for Two-family dwellings, and
- R3 – Which allowed for multiple family dwellings

There were minimal changes to where these residential zones were located. At incorporation of the Town of Banff in 1990, the first Land Use Bylaw closely resembled the Banff Townsite Zoning Regulations with the addition of another residential district. The R3 areas allowed for Row Housing and R4 allowed for Apartment Housing.



Through the early 1990s, the Banff Land Use By-Law Rewrite Steering Committee developed the Land Use Bylaw with changes being adopted in 1992. There were a number of substantial differences between the Land Use Bylaw that was adopted in 1992 and previous regulations. Most notable was the move away from residential areas of the town being zoned in to one of four main residential districts, to specific Land Use Districts being created for what were determined to be definable neighbourhoods or land use districts. This change introduced 18 residential districts, each with their own stated purpose and unique regulations intended to develop an aspirational character, or maintain an existing one. This general approach continues today where there are now 24 separate and distinct residential Land Use Districts with each having differing development regulations.

District Development Regulations

To achieve the desired outcomes of each residential district, the Land Use Bylaw regulates both a buildings form, and a buildings function. The function of a building is limited by the allowable uses and the maximum density (Floor Area Ratio), while a building's form is limited through requirements for maximum height, site coverage and setbacks. See Attachment 1 – Illustrations of Terminology for Setbacks, Site Coverage and Floor Area Ratio.

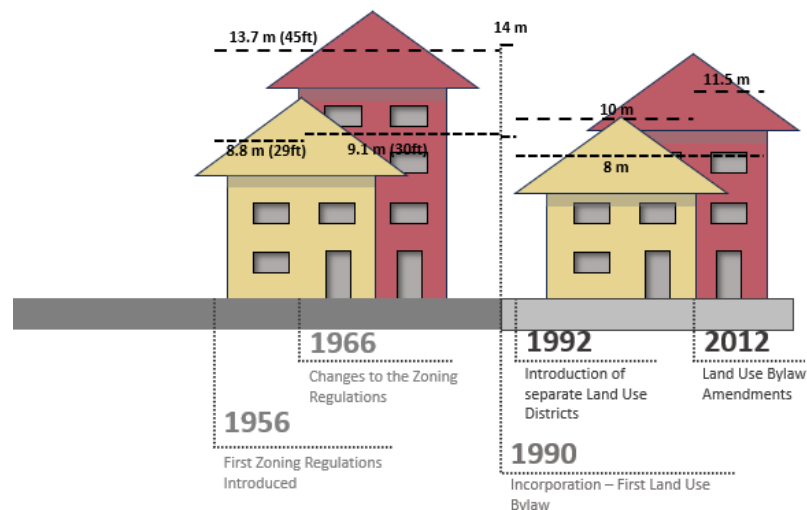
With a fixed land base, 98.5% of residential properties in Banff currently contain housing. Therefore, in order to add more housing within the community, development either requires the demolition of existing housing to make better use of a site, or, the addition of housing around existing building(s) on a site. In order to increase density within Banff above the current limits, changes to both building form and function would be required.

The last substantial changes to the Land Use Bylaw with regards to residential density were completed in 2012. These changes have had a significant impact as 10% of housing in Banff has been developed in the last 10 years. However, there is still a shortfall of between 700 and 1,000 homes. Making changes to regulations that allow for an increase in density will result in additional housing being built in Banff. It is worth noting that increases to residential density does not mean that all properties will immediately redevelop to the maximum allowed but it does allow those property owners who are considering redevelopment, to maximise their site. It could also prevent lower density housing being constructed.

Background on Residential Building Height

One interesting reference point for Governance and Finance to consider is that over time, while maximum density has increased, allowable residential building heights in Banff have decreased, or in other words, you used to be able to build taller residential buildings. There are multiple buildings in the community that are products of these earlier regulations and administration is of the opinion that returning to a taller maximum building height is an appropriate step at this time.

For reference, the graphic below and supporting images reflect some of the taller buildings constructed under previous land use regulatory environments, all of which have served the residential needs of the community for many decades without issue.



What are our options?

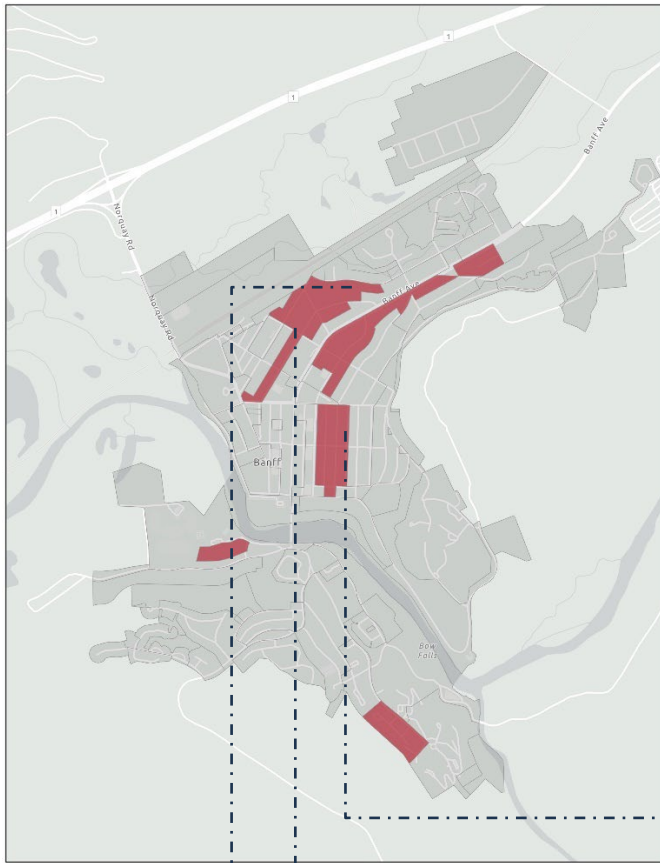
With 24 separate and distinct residential Land Use Districts there are multiple options to implement changes that would result in allowing more homes to be built in Banff. One challenging aspect of having so many distinct residential land use districts is that it suggests that Banff contains 24 distinct neighbourhoods, all of which are so unique from one another that they require their own distinct regulatory environment. Administration considers this to be a fundamental point to consider and for Council to provide direction on.

1.a Development Regulations - Simplify

With 24 separate and distinct residential Land Use Districts, one option would be to simplify the development requirements to reflect the existing reality that there are effectively three broad categories of density which could be characterized as High, Medium and Low Density. Working within the existing Land Use Bylaw, Administration has grouped existing districts with similar development regulations into these three categories and have provided some context as to the current conditions in those districts and potential changes:

Existing High Density Districts

RBA – Banff Avenue; RCR – Cougar Rabbit; RCM – Central Muskrat; RWB – West Birch; RBS – Banff Springs



Current Development Regulations

Highest Density Uses

Apartment

Maximum Density

Ranges from 0.8 to 1.3

Maximum Height

Ranges from 9 m to 14 m with most being 11/11.5 m

9 m - 100/200 Blocks of Muskrat St, and sections of Rabbit St and Squirrel St

14 m - Banff Springs District

Historical Context

The majority of these areas were zoned has the highest density residential zones prior to, and just after, incorporation that allowed a maximum height of 45 ft (13.7 m)

Examples of existing apartment housing in these districts



444 Cougar St – 1988
Approximately 13 m
4 stories



404 Banff Ave – 1978
Approximately 12 m
4 stories



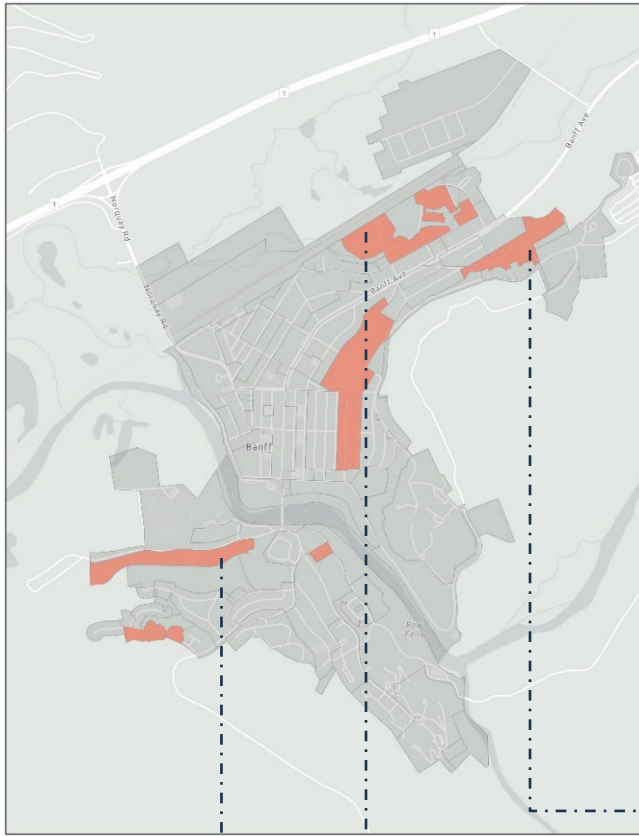
220 Muskrat St – 1988
Approximately 13 m
3.5 stories

Potential Changes to the Development Regulations

- Maintain Apartment Housing as a permitted use across these districts
- Allow for a maximum height of 14.5 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 1.3 for Apartments across these districts
- Introduce a minimum required number of units per lot
- Reduce minimum setbacks

Existing Medium Density Districts

RNC – North Central; RCN – Cougar North; RTR – Tatanga Ridge; RCA – Cave Avenue; RGA – Glen Avenue; RMS2C – Middle Springs 2C; RMS2F – Middle Springs 2F



Current Development Regulations

Highest Density Uses

Row Housing and Fourplex as permitted uses and Apartments and Stacked Row as discretionary uses

Maximum Density

Ranges from 0.5 to 1

Maximum Height

9 m or 10 m

Historical Context

This includes some older areas along Cave Avenue and the 100/200/300 blocks of Muskrat along with Row Home developments on Marmot Crescent, Sundance Court and Tatanga. This area also includes some existing Apartment buildings that couldn't be rebuilt under today's Land Use Bylaw.

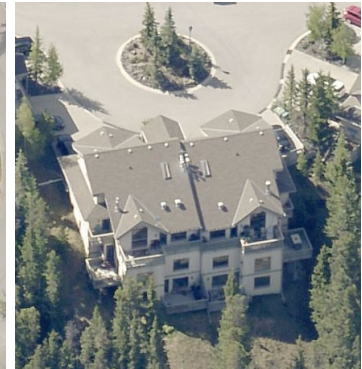
Examples of existing medium density housing in these districts



113 Cave Ave
19 Homes



100 Whiskey Jack Cres
8 Homes



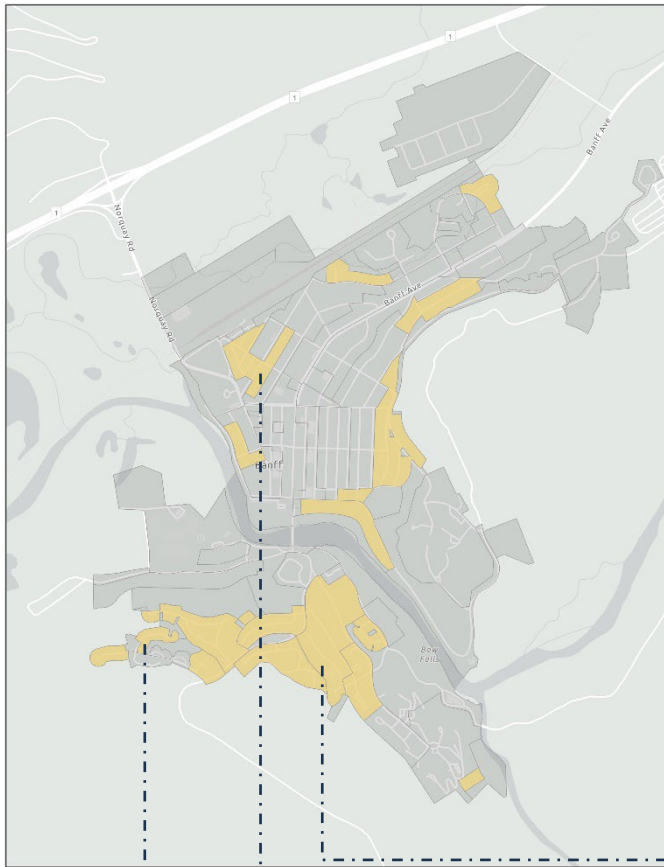
2 Otter Lane
6 Homes

Potential Changes to the Development Regulations

- Make Row/Stacked Row Housing a permitted use across these districts and amend the associated definitions
- Allow for a maximum height of 11.5 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 1.0 across these districts
- Introduce a minimum required number of units per lot

Existing Low Density Districts

RMR – Marmot Rundle; RSC – Squirrel Cougar; RRF – Residential Riverfront; RTM – Tunnel Mountain; RSA – Spray Avenue; RRA – Rainbow; RVV – Valleyview; RMS2E; RMS2B; RMS2D; RMS1



Current Development Regulations

Highest Density Uses

Row Housing, Fourplex and Duplex with Accessory Dwellings

Maximum Density

Ranges from 0.45 to 0.8

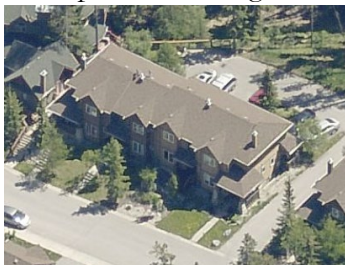
Maximum Height

Majority 9 m with one district at 8 m and one at 10 m

Historical Context

Includes older low density areas including Kootenay Ave, Spray Ave, Bow Ave, Buffalo St and Marmot Place as well as Valley View and the majority of Middle Springs.

Examples of existing housing of varying densities in these districts



Fairholme Place
4 Homes



318 Squirrel St
4 Homes



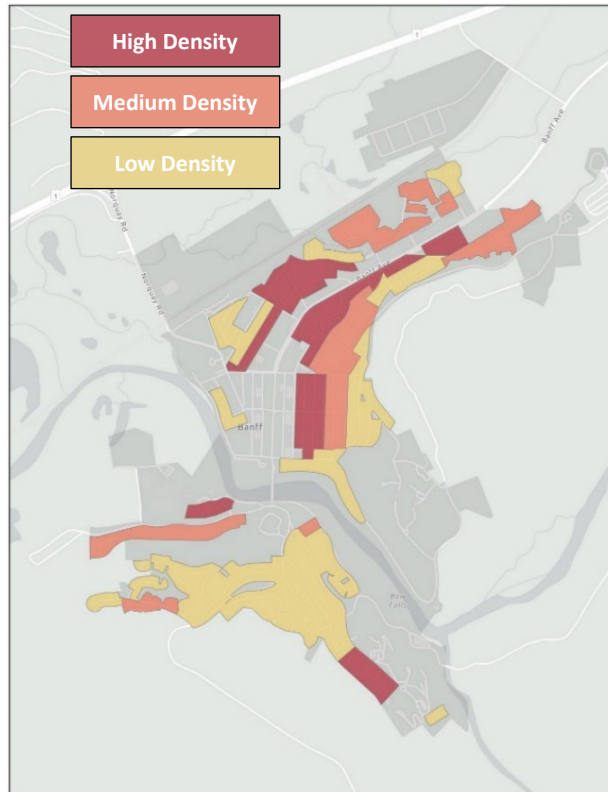
1 Kootenay Ridge
2 Homes

Potential Changes to the Development Regulations

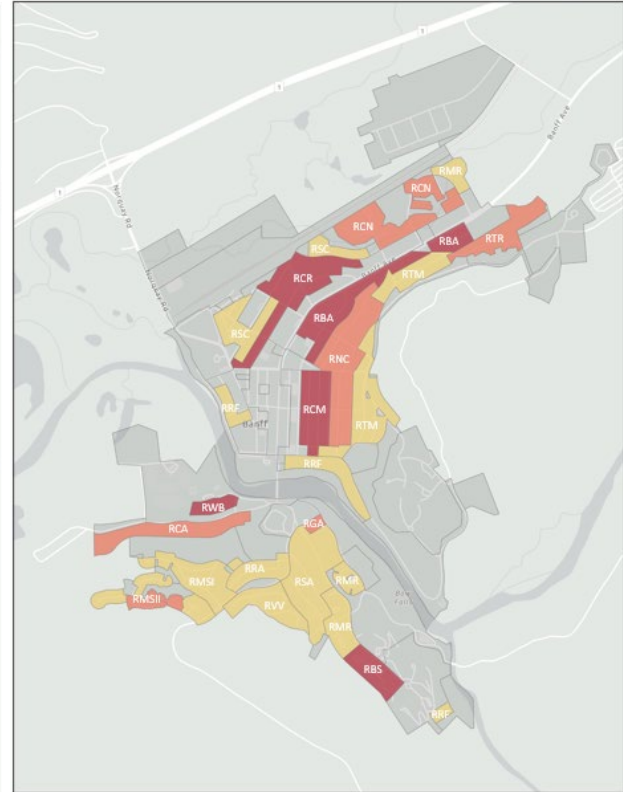
- Allow Fourplex Housing as a permitted use across these districts (Currently 4 units are allowed per lot, but in a “Duplex with suites” configuration)
- Allow for a maximum height of 10 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 0.8
- Introduce a minimum required number of units per lot

Standardizing and simplifying development regulations could be achieved in one of two ways:

- Amend the Land Use District map to include three residential zones: High Density, Medium Density and Low Density; or;
- Retain the existing Land Use Districts and apply the same regulations for each of the density scenarios to each district.



Three residential district option



Existing districts with same regulations

Amending the Land Use District map to have three separate residential zones would greatly simplify the Land Use Bylaw. Retaining the existing Land Use Districts would allow for the option of having specific regulations for a specific district to remain.

1a. Development Regulations – Options to Simplify

Direct administration to draft Land Use Bylaw amendments that standardize and simplify development regulations to create high, medium and low density scenarios which includes:

- i. An amendment to the Land Use District map to include three residential zones; or,
- ii. Applying the same regulations for each density scenario to the existing Land Use Districts

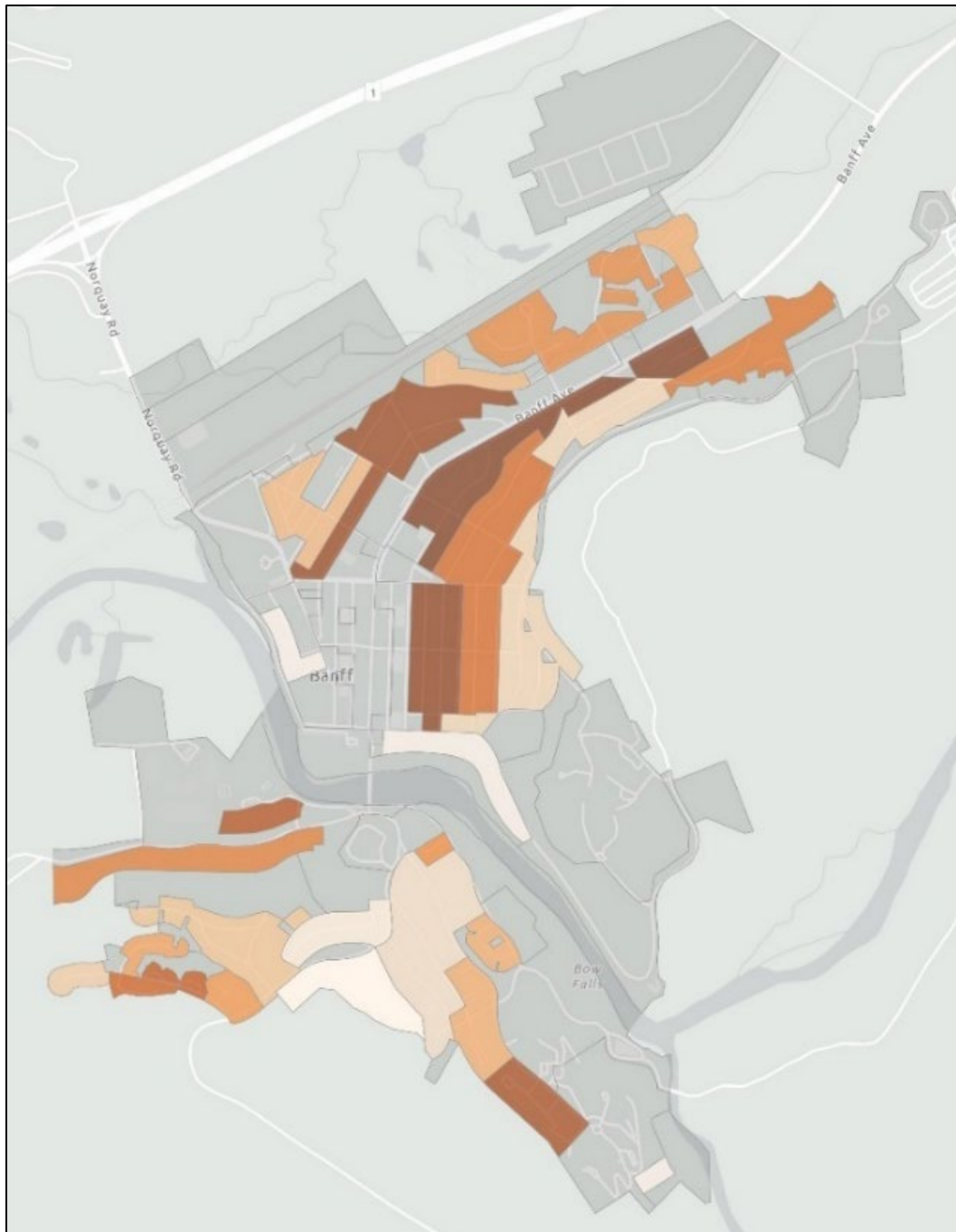
1b. Development Regulations – Maintain Existing Land Use District Structure and Amend Within

Since Incorporation in 1990 and the introduction of the first Land Use Bylaw that contained residential development requirements (height, FAR, setbacks) and distinct residential land use districts, changes to those requirements have been minor over the years. The largest overhaul of residential components of the Land Use Bylaw was completed in 2012 and the main changes included:

- Accessory dwellings permissible in duplex housing

- Additional and deletion of permitted and discretionary uses on a district-by-district basis
- General FAR increases
- General height increases
- Reduced setbacks

Administration could continue this approach and propose custom amendments to each of the 24 residential districts. Given the range of potential options, administration would require direction on the type of amendments to explore. Administration would then return with a suite of options that fall under that direction.



Existing Land Use District Map Showing Residential Districts

1b. Development Regulations – Options to Maintain Existing Land Use District Structure and Amend Within

- i. Direct administration to return to the Governance and Finance Committee with analysis of how density can be increased within the existing area descriptions and purposes of the 24 residential districts in the Land Use Bylaw; or,
- ii. Direct administration to return to the Governance and Finance Committee with options for Land Use Bylaw amendments that employ a broader approach, and propose development regulation changes based on Administration's interpretation of similar residential districts.

With any proposed amendments to the Development Regulations, administration will return with other general amendments to achieve the direction provided. These will include, but is not limited to, amendments of:

- Site Coverage
- Setbacks
- Permitted and Discretionary Uses including amendments to the residential use definitions
- Reduced Floor Area Ratio for lower density development
- Allowable projections into setbacks

Any proposed amendments will also take into account the objectives of the Banff Design Guidelines and will continue to reinforce the requirement that all development in Banff maintains a community character which is consistent with and reflects the surrounding environment.

2. Development Regulations – Additional Options

Removing Single Detached Housing as an allowable use

Through motion FIN23-102, the Governance and Finance Committee directed administration to return with *text for Discussion Document for an amending bylaw to the Land Use Bylaw to remove single detached housing as a use*. Administration does not recommend removing Single Detached Housing as allowable use at this time.

Removing Single Detached Housing an allowable use would create a large number of non-conforming use situations. Through the Municipal Government Act, and the Land Use Bylaw, there are specific limitations with development that can occur on a site that has a non-conforming use. This may limit or prohibit the creation of extra bedrooms, or additional homes on a site that has a non-conforming use. This would have significant implications for heritage properties as a large number of properties on the heritage inventory are single detached homes.

Further to this, administration understands that the intent of this direction would be to reduce the ability for development of a single home on a site. In an effort to address this, the recommendation noted above is to introduce a minimum number of dwellings per site. This would allow flexibility of the type of housing that could be developed. For example, a site containing an existing single detached home could retain the single detached home and add additional homes through other housing types. Another example would be that, for example, if there was a minimum requirement of four dwellings per site, this could be achieved through either a Fourplex, two Duplex's or four Single Detached Homes.

Introducing a maximum dwelling unit size for all housing types

Through motion FIN23-103, the Governance and Finance Committee directed administration to return *with a report outlining options for creating a maximum dwelling unit size for all housing types*.

The current Land Use Bylaw includes regulations in some districts for a maximum dwelling size. In some instances this may have prevented large individual homes, however administration is aware of a number of instances where this has prevented the creation of additional bedrooms at existing homes. It is also worth noting that the maximum number of bedrooms per home (typically to four or six) is also limited in almost all residential districts.

In order to maximise the flexibility for those looking to develop additional homes in Banff, administration recommends removing limits to both minimum and maximum dwelling size in the Land Use Bylaw. The introduction of minimum dwellings per site, along with a Floor Area Ratio that is lower for development that contains fewer homes would minimize the opportunity for large scale individual houses.

2. Development Regulations – Additional Options

- i. Direct administration to include the removal of minimum and maximum dwelling size with any Land Use Bylaw amendments;
- ii. Direct administration to include amendments to the development regulations to remove Single Detached Housing as an allowable use; or,
- iii. Direct administration to include amendments to the development regulations to introduce a maximum dwelling unit size for all housing types.

3. Amending the Boundaries of Existing Residential Land Use Districts

As noted in the *Simplify the development regulations* section of this report, administration is of the opinion that the existing land use districts can be grouped into high, medium and low density, based on their district development regulations. As part of this exercise, administration recommends examining each of the Land Use Bylaw districts to determine if it would be in the appropriate grouping. In some cases, districts (or part of districts) may only allow for lower density where it would be more appropriate to have medium or high density. In the case that there are districts grouped inappropriately, administration recommends adjusting its boundaries so that the district is more consistent with an appropriate group.

The Land Use Districts according to the groupings of High Density, Medium Density, and Low Density are listed below, along with administration's analysis of whether to look at an adjustment. Generally, the criteria administration suggests for examining adjustments are:

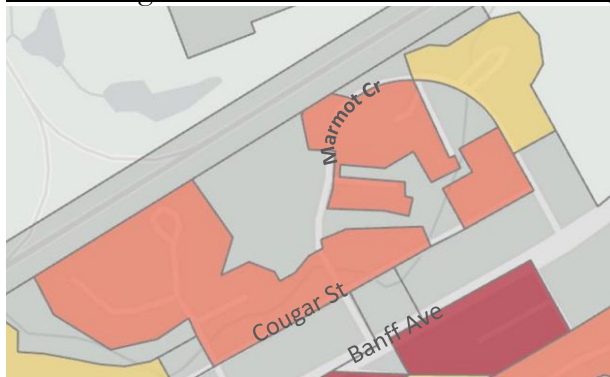
- Is the subject area especially close to public, commercial and institutional services;
- Is the subject area in close proximity to employment centres;
- Does the subject area reflect an abrupt transition between groupings (ie. land use districts that are part of the High Density grouping are directly adjacent to those that are part of the Low Density grouping);
- Does the subject area have strong transportation connectivity for all modes that allows residents access to services, jobs, etc.;
- Is the subject area already similar in nature to another district which is already in a higher density grouping; and,
- Are there existing non-conforming buildings that could not be redeveloped.

In addition to considering if the district is grouped with the most appropriate density, consideration has also been given to the boundary line of each district and administration has highlighted some areas where a boundary adjustment might be appropriate.

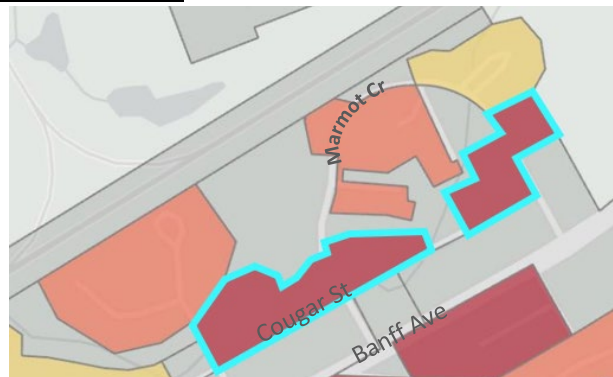
Current Land Use District	Current Density Category	Is Current Category Reflective of Criteria	Suggest Density Category	Suggested Boundary Change
RBA: Banff Avenue District	High	✓		No
RBS: Banff Springs District	High	✓		No
RCM: Central Muskrat District	High	✓		No
RCR: Cougar / Rabbit District	High	✓		No
RWB: West Birch District	High	✓		No
RCA: Cave Avenue District	Medium	✓		No
RCN: Cougar North District	Medium	✗ ✓	High (Partial)	Yes
RGA: Glen Avenue District	Medium	✓		No
RMSII(c): Middle Springs II(C) District	Medium	✓		No
RMSII(f): Middle Springs II(F) District	Medium	✓		No
RNC: North Central District	Medium	✓		No
RTR: Tatanga Ridge District	Medium	✓		No
RMR: Marmot/Rundle District	Low	✗ ✓	High (Partial)	Yes
RMSI: Middle Springs I District	Low	✓		No
RMSII(b): Middle Springs II(B) District	Low	✓		No
RMSII(d): Middle Springs II(D) District	Low	✓		No
RMSII(e): Middle Springs II(E) District	Low	✓		No
RRR: Rainbow Avenue District	Low	✗	Medium	No
RRF: River Front District	Low	✗ ✓	Medium (Partial)	Yes
RSA: Spray Avenue District	Low	✗		No
RSC: Squirrel/Cougar District	Low	✗		No
RTM: Tunnel Mountain District	Low	✗ ✓	Medium (Partial)	Yes
RVV: Valley View District	Low	✗	Medium	No

The rationale for shifting of each district proposed to be adjusted is detailed below:

RCN: Cougar North District and RMR: Marmot/Rundle District



RCN: Cougar North District and RMR: Marmot/Rundle District existing



RCN: Cougar North District and RMR: Marmot/Rundle District proposed

Propose that the RCN: Cougar North District, is considered with the High Density grouping.
Rationale:

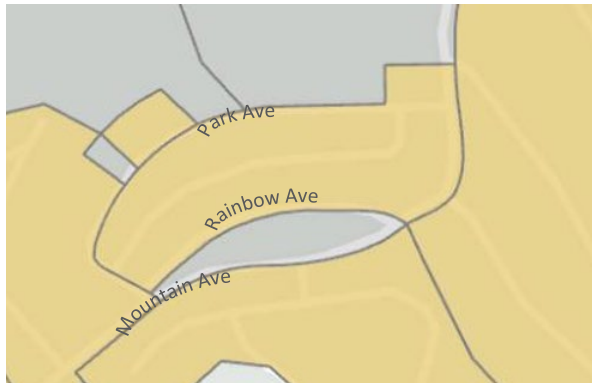
- existing uses include 3-storey apartment housing
- close proximity to employment opportunities;

- transportation connectivity for all modes is high;
- areas of underutilized land with the ability to intensify;
- strong mix of densities already provided so permitted densities could be brought up to be more consistent across the district; and,
- this area was zoned for apartments prior to Incorporation.

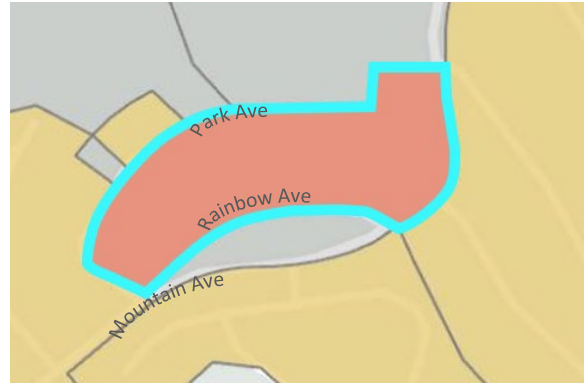
Propose that a portion of the RMR: Marmot/Rundle District is considered with the High Density grouping. Rationale:

- proposed area is close to Banff Avenue and associated employment hubs;
- transportation connectivity for all modes is high

RRA: Rainbow Avenue District



RRA: Rainbow Avenue District existing

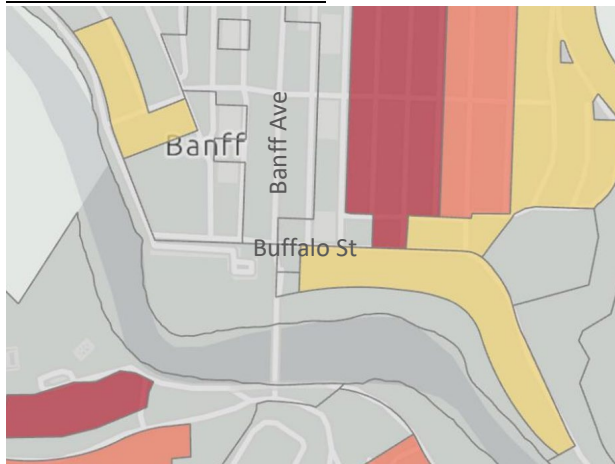


RRA: Rainbow Avenue District proposed

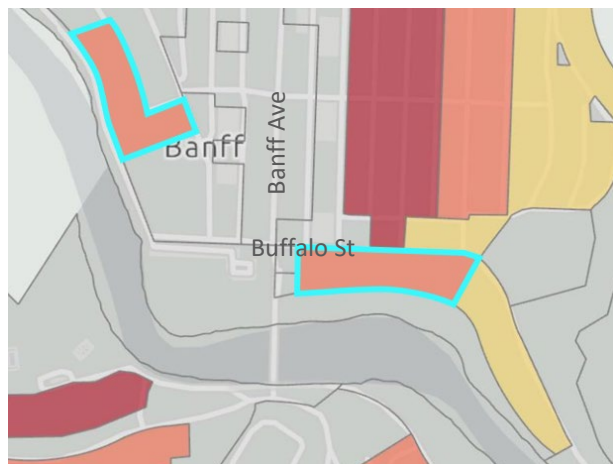
Propose that the RRA: Rainbow Avenue District, is considered with the Medium Density grouping. Rationale:

- transportation connectivity for all modes is high;
- large lots with future development potential;
- has comparable attributes in context/location to another district which is already in the Medium Density grouping [RMSII(f) and RMSII(c)]

RRF: River Front District



RRF: River Front District existing

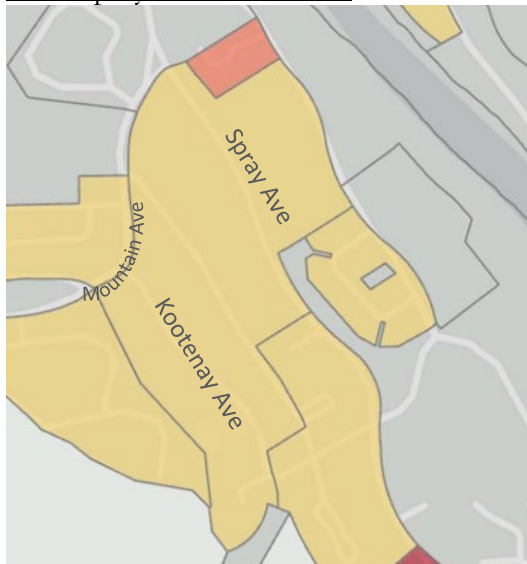


RRF: River Front District proposed

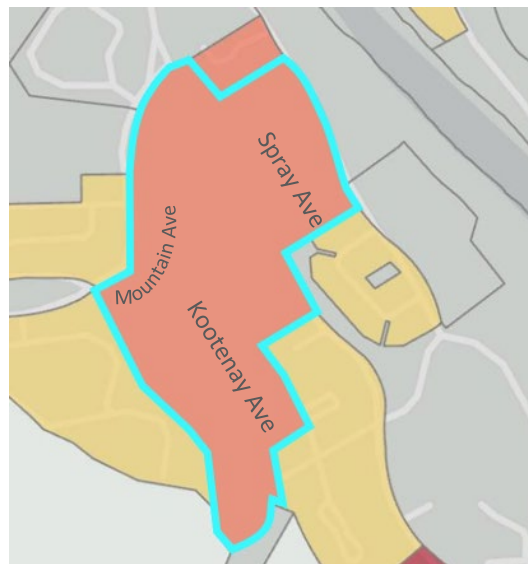
Propose that a portion of the RRF: River Front District is considered with the Medium Density grouping. Rationale:

- close to public, commercial and institutional services;
- close proximity to employment opportunities;
- currently an abrupt transition between land use districts (a portion of the land use district is directly adjacent to dense commercial areas);
- large lots with future development potential;
- transportation connectivity for all modes is high

RSA: Spray Avenue District



RSA: Spray Avenue District existing

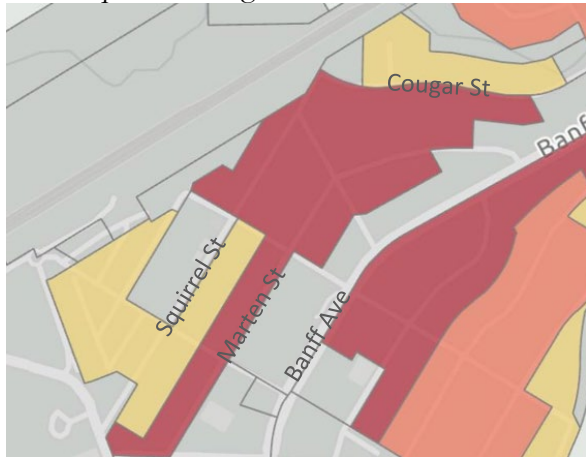


RSA: Spray Avenue District proposed

Propose that the RSA: Spray Avenue District is considered with the Medium Density grouping. Rationale:

- close to public, commercial and institutional services;
- close proximity to employment opportunities;
- transportation connectivity for all modes is high;
- large lots with future development potential;
- similar in context/location to another district which is already in the Medium Density grouping (RGA)

RSC: Squirrel/Cougar District



RSC: Squirrel/Cougar District existing

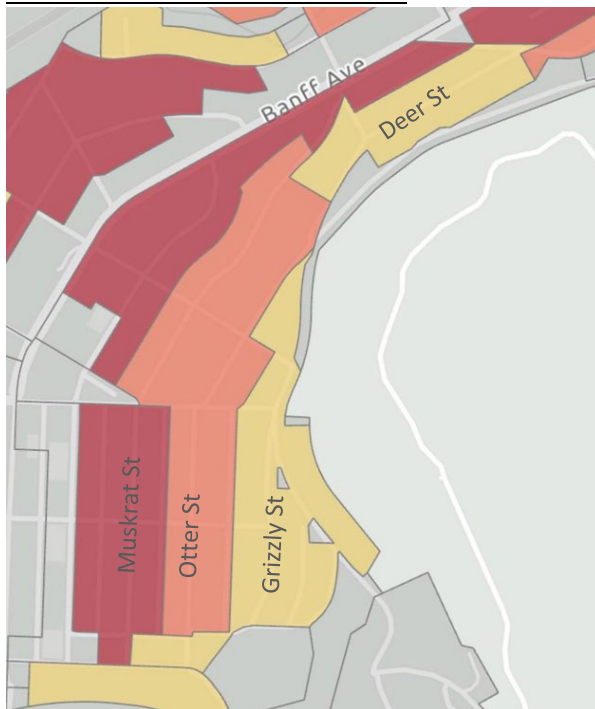


RSC: Squirrel/Cougar District proposed

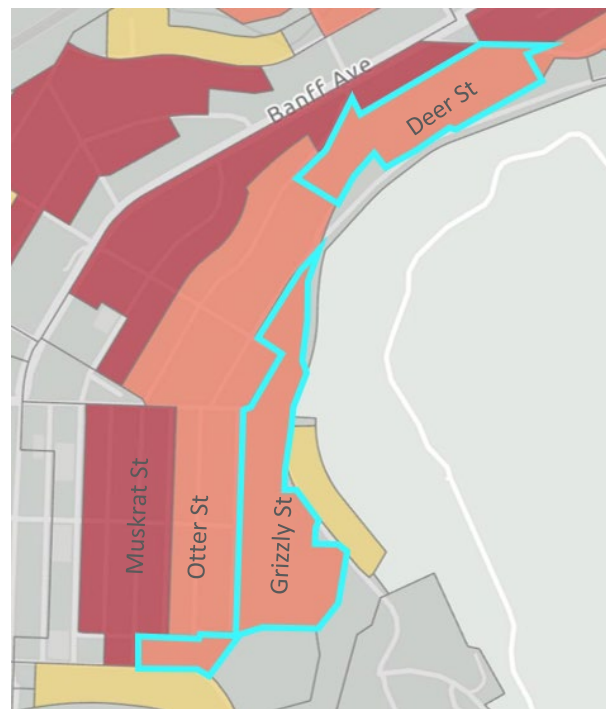
Propose that the RSC: Squirrel/Cougar District is considered with the Medium Density grouping.
Rationale:

- close to public, commercial and institutional services;
- close proximity to employment opportunities;
- currently an abrupt transition between groupings;
- transportation connectivity for all modes is high;
- similar to another district which is already in a higher density grouping (RCN, RCM);
- strong mix of densities already provided so permitted densities could be brought up to be more consistent across the district

RTM: Tunnel Mountain District



RTM: Tunnel Mountain District existing

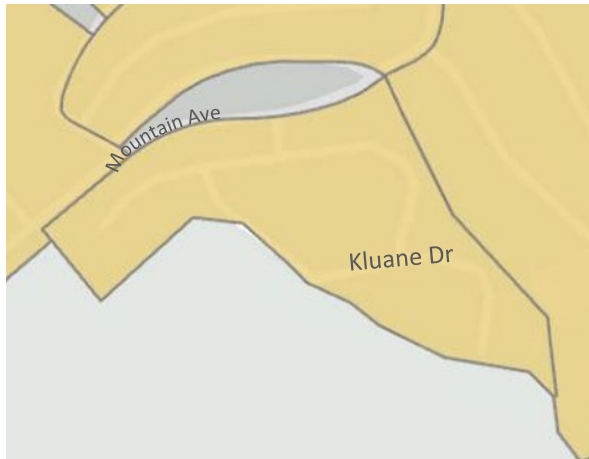


RTM: Tunnel Mountain District proposed

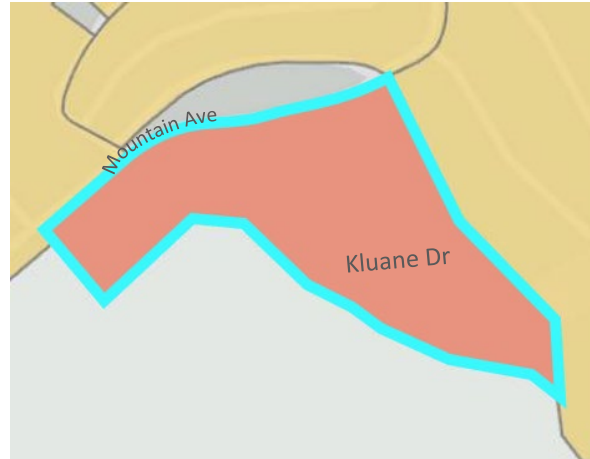
Propose that a portion of the RTM: Tunnel Mountain District is considered with the Medium Density grouping. Rationale:

- currently contains multiple examples of medium density housing forms (fourplexes; row homes);
- close to public, commercial and institutional services;
- close proximity to employment opportunities;
- currently an abrupt transition between groupings;
- transportation connectivity for all modes is high;
- similar to another district which is already in a higher density grouping (RCN, RCM, RTR)

RVV: Valley View District



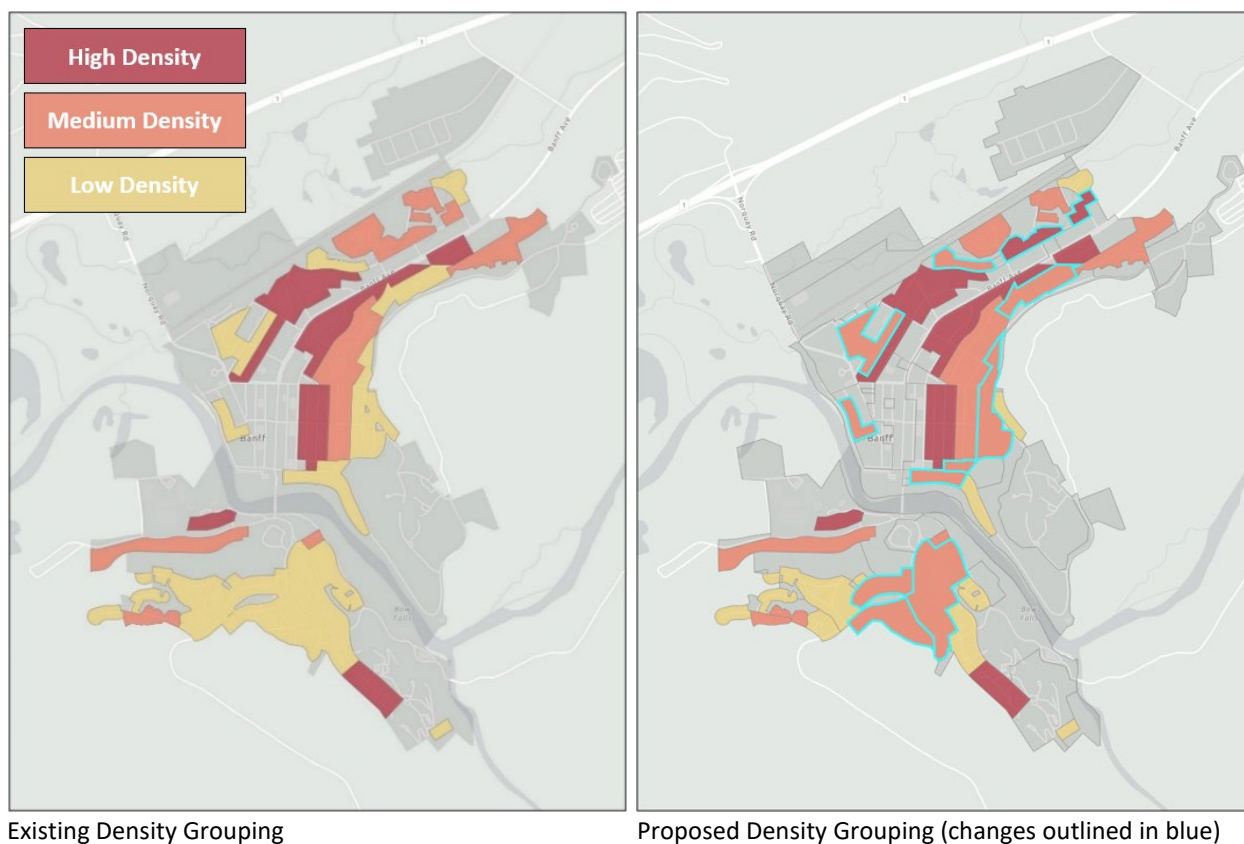
RVV: Valley View District existing



RVV: Valley View District proposed

Propose that the RVV: Valley View District is considered with the Medium Density grouping. Rationale:

- already a medium density housing form (row homes);
- areas of underutilized land with the future potential to intensify;
- similar in context/location to another district which is already in the Medium Density grouping [RMSII(f) and RMSII(c)]



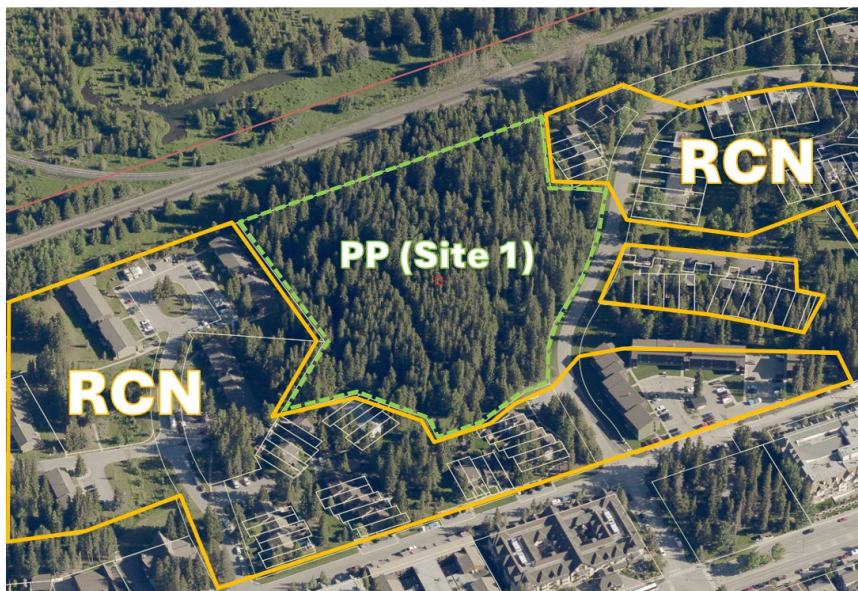
3. Options for Amending the Boundaries of Existing Residential Land Use Districts

- i. Direct administration to draft amendments to the Land Use Districts boundaries and their associated regulations for the RCN: Cougar North, RMR: Marmot/Rundle, RRA: Rainbow Avenue, RRF: River Front, RSA: Spray Avenue, RSC: Squirrel/Cougar, RTM: Tunnel Mountain and RVV: Valley View districts as outlined in this section of the report;
- ii. Provide direction to administration on alternate density grouping and/or district boundaries for any Land Use District(s); or,
- iii. Make no changes to the existing Land Use District boundaries and use the density grouping outlined in section 1 of this report.

4. Rezone non-residential districts to residential districts

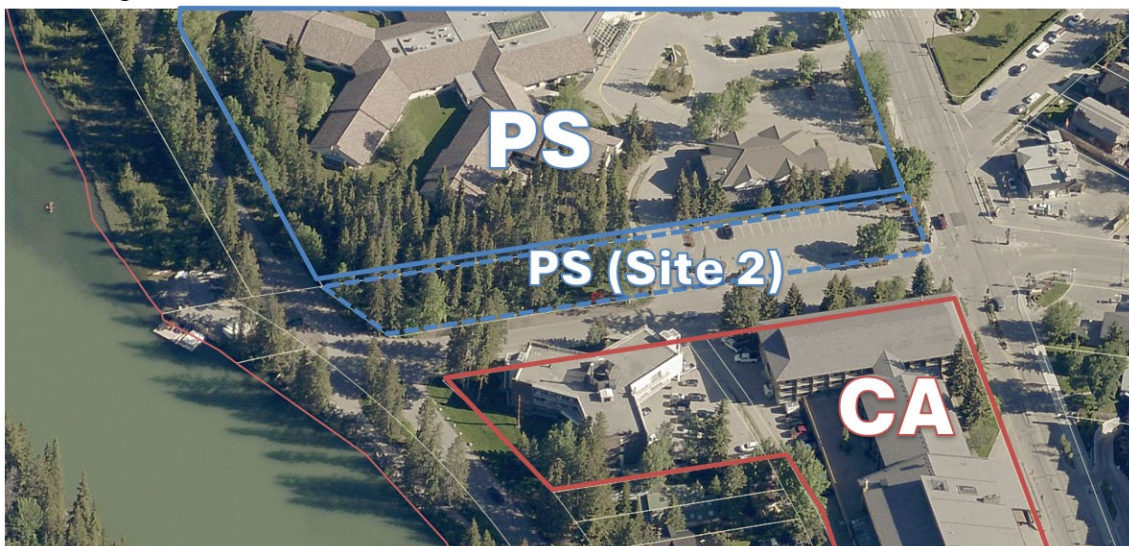
As discussed in the background section of this report, defining Banff's current residential land use districts was an assignment taken on by a committee in the early 1990s. The outcome of this exercise, and subsequent amendments has resulted in the residential districts we have today. In 2012 a review of the Land Use Bylaw examined a number of Town of Banff owned properties which could be "rezoned" from a non-residential category to a residential category. In September, many of the same sites were reviewed again in the context of determining where the Town's next affordable housing project should be. As a way to build on that conversation, administration is suggesting a series of smaller "rezonings" to either increase the potential municipal, affordable building stock or to use in partnership with other interested parties. No immediate development activity is foreseen for these sites at this time.

Site 1: Marmot Crescent Parkland



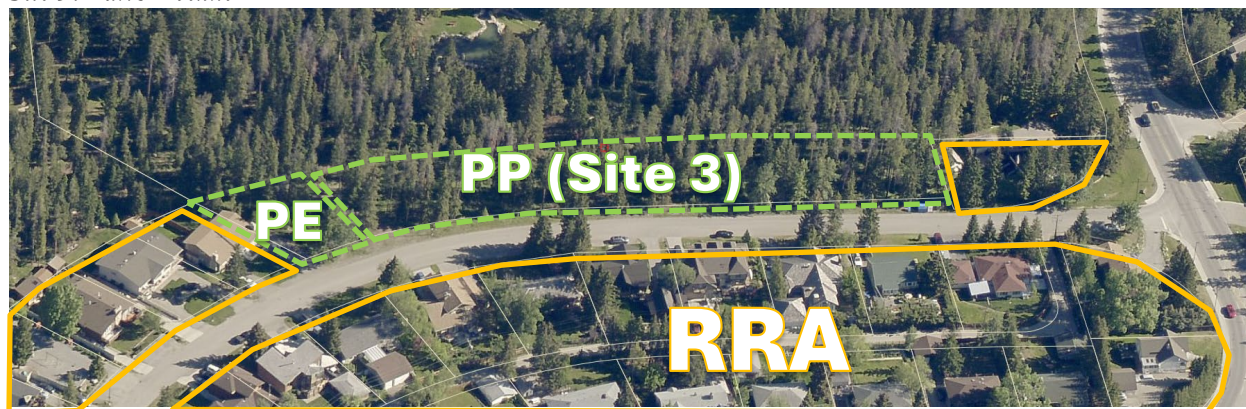
The Marmot Crescent site was looked at in 2012 for rezoning, and is again being suggested for transition to a residential land use district. Located between Marmot Crescent and the Whiskey Creek neighbourhood, this 25,000m² site is similar in character to the multi-family neighbourhoods that surround it, with a relatively flat topography which includes both remnant and active water courses that would affect developability. The proposed immediate action would be to “rezone” from the Public Parkland (PP) land use district to RCN (Cougar North).

Site 2: Hospital Lands / Parcel FE



Parcel “FE” was reviewed by Council in February of 2022 in the context of building “senior and accessible housing”. The property is currently used for surface parking, a driveway, and contains an undeveloped portion. Located adjacent to medical services, a large hotel, the downtown core, and the Bow River, it is well situated for a future residential project. The site is currently within the PS (Public Service) land use district and is approximately 3,250m² in area. The proposed immediate action would be to “rezone” from the Public Service (PS) land use district to the RBA: Banff Avenue residential land use district.

Site 3: Park Avenue



The Park Avenue site was looked at in 2012 for rezoning, and is again being suggested for transition to a residential land use district. Situated on a sloping hillside, this 6,000m² site would be well placed for “walk-out” style duplex or row home development. While grade on the site would be a challenge, proximity to the downtown is very good given the localized trail network. The proposed immediate action would be to “rezone” from the Public Parkland (PP) land use district to the RRA: Rainbow Avenue residential land use district.

Site 4: Porcupine / Marmot Crescent



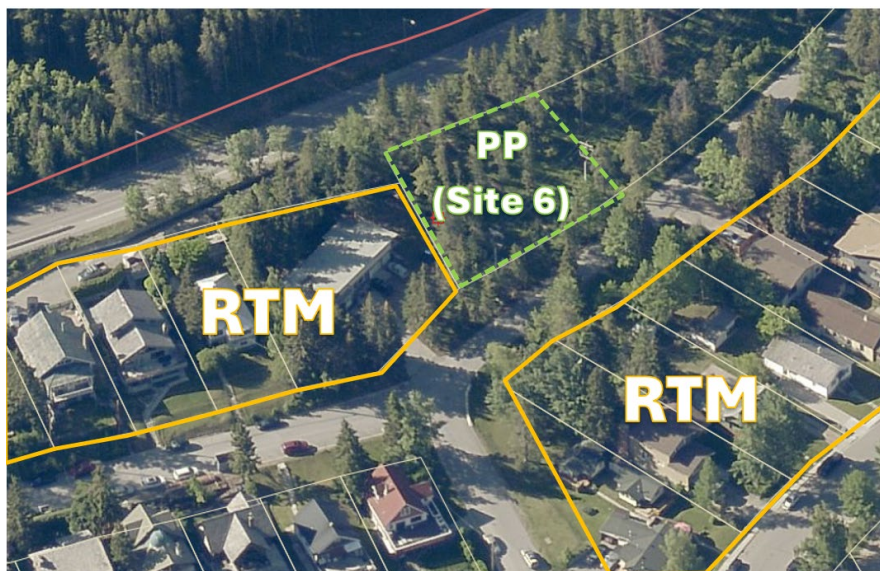
This 3,500m² parcel is currently within the Public Parkland (PP) land use district in an unimproved state. The property is flat with potential access from Marmot Crescent and / or Porcupine Place. Under the *Banff National Park of Canada Management Plan*, an offsetting piece of land would have to be allocated back to the Public Parkland (PP) land use district. Located adjacent to an existing apartment development and a row home development, the potential development scenario would be a row-home or small apartment project. The proposed immediate action would be to “rezone” from the Public Parkland (PP) land use district to the RCN (Cougar North) land use district.

Site 5: 600 Block Remnant – Cougar Street



This 2,000m² area is currently within the Public Parkland (PP) land use district and contains limited trail infrastructure. Located between two existing apartment developments, it is proximate to Banff Avenue and associated services, and is relatively flat. It may contain groundwater challenges attributable to the former Whiskey Creek. A likely development scenario at this site could be a small apartment building. The proposed action would be to “rezone” from the Public Parkland (PP) land use district to the RCN (Cougar North) land use district.

Site 6: Deer Street Bench



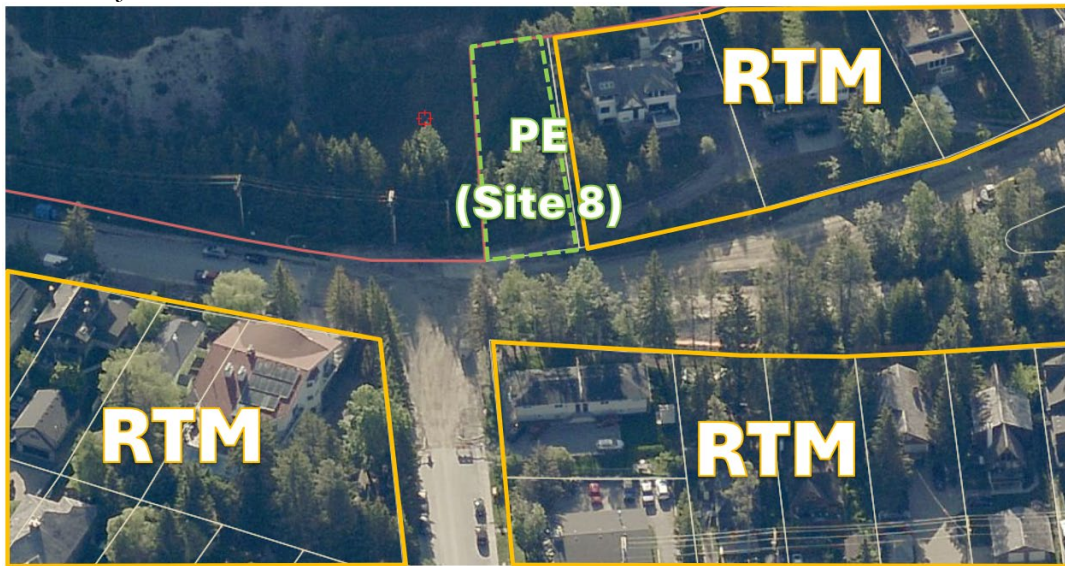
This 900m² parcel is currently within the Public Parkland (PP) land use district in an unimproved state. The property is sloped with potential access off of Deer Street. Under the *Banff National Park of Canada Management Plan*, an offsetting piece of land would have to be allocated back to the Public Parkland (PP) land use district. Located adjacent to an existing multi-unit building, potential development scenario would be row homes or a fourplex. The proposed immediate action would be to “rezone” from the Public Parkland (PP) land use district to the RTM (Tunnel Mountain) land use district.

Site 7: Banff Avenue and Antelope Lane



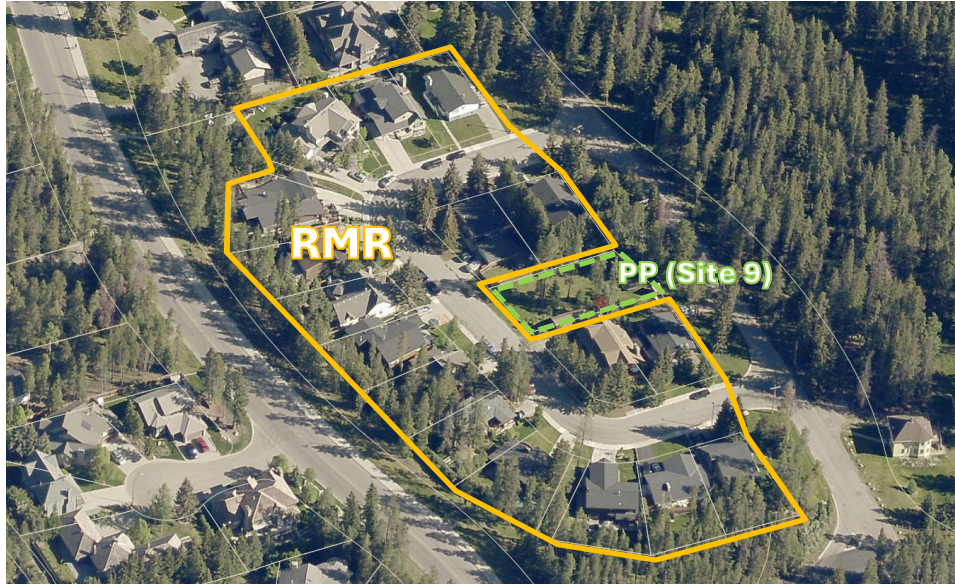
This 565m² parcel is currently within the Public Parkland (PP) land use district in an unimproved state. The property is flat with potential access off of Banff Avenue, and excellent proximity to utilities, transit and other services. While previously limited by on-site parking requirements, with a decoupled parking regulations this site could yield 8-10 units. Under the *Banff National Park of Canada Management Plan*, an offsetting piece of land would have to be allocated back to the Public Parkland (PP) land use district. The proposed action would be to “rezone” from the Public Parkland (PP) land use district to the RBC (Banff Avenue) land use district.

Site 8: St. Julien Lot



This 630m² single lot is located at the junction of St. Julien Road and Wolf Street. This property was looked at in 2012 for rezoning, and is again being suggested for transition to a residential land use district. While the potential yield is quite small, and there would have to be associated infrastructure changes on the property, it would be another opportunity to add housing stock to the community. The proposed immediate action would be to “rezone” from the Environmental Protection (PE) land use district to the adjacent RTM (Tunnel Mountain) land use district.

Site 9: Glen Crescent Reserve Lot



This 700m² single lot is located along Glen Avenue within the Glen Crescent neighbourhood. While the potential yield is quite small, and there may be barriers in association with the original subdivision and potential “reserve” status, it would be another opportunity to add housing stock to the community. The proposed immediate action would be to “rezone” from the PP (Public Parkland) land use district to the adjacent RMR (Marmot / Rundle land use district).

Various Sites: Management Plan Compliance

The *Banff National Park of Canada Management Plan* contains the following policy guidance:

The community reflects its national park setting and blends with the surrounding landscape by ensuring the net amount of land designated as Public Parkland (PP) and Environmental Protection (PE) does not decrease from that existing as of December 31, 2021, and by not allowing further commercial development in these areas.

This “off-setting” clause could be addressed through the rezoning of multiple properties in association with the above that could be added to the Public Parkland (PP) or Environmental Protection (PE) inventory, notably a combination of the following sites:



4. Options to Rezone non-residential districts to residential districts

- i. Provide direction to administration on which non-residential districts should be considered for rezoning to residential districts and direct administration to return with a report outlining next steps; or,
- ii. Make no changes to non-residential zoned land at this time.

Response Options

As highlighted in this report, administration is seeking direction on 3 topic areas. The options are highlighted in each section and are:

1. Development Regulations

a. Simplify

Direct administration to draft Land Use Bylaw amendments that standardize and simplify development regulations to create high, medium and low density scenarios which includes:

- i. An amendment to the Land Use District map to include three residential zones; or,
- ii. Applying the same regulations for each density scenario to the existing Land Use Districts

b. Maintain Existing Land Use District Structure and Amend Within

- i. Direct administration to return to the Governance and Finance Committee with analysis of how density can be increased within the existing area descriptions and purposes of the 24 residential districts in the Land Use Bylaw; or,

- ii. Direct administration to return to the Governance and Finance Committee with options for Land Use Bylaw amendments that employ a broader approach, and propose development regulation changes based on Administration's interpretation of similar residential districts.

2. Development Regulations – Additional Options

- i. Direct administration to include the removal of minimum and maximum dwelling size with any Land Use Bylaw amendments;
- ii. Direct administration to include amendments to the development regulations to remove Single Detached Housing as an allowable use; or,
- iii. Direct administration to include amendments to the development regulations to introduce a maximum dwelling unit size for all housing types.

3. Amending the Boundaries of Existing Residential Land Use Districts

- i. Direct administration to draft amendments to the Land Use Districts boundaries and their associated regulations for the RCN: Cougar North, RMR: Marmot/Rundle, RRA: Rainbow Avenue, RRF: River Front, RSA: Spray Avenue, RSC: Squirrel/Cougar, RTM: Tunnel Mountain and RVV: Valley View districts as outlined in this report;
- ii. Provide direction to administration on alternate density grouping and/or district boundaries for any Land Use District(s); or,
- iii. Make no changes to the existing Land Use District boundaries and use the density grouping outlined in section 1 of this report.

4. Rezone non-residential districts to residential districts

- i. Provide direction to administration on which non-residential districts should be considered for rezoning to residential districts and direct administration to return with a report outlining which other land could be rezoned to comply with the Banff National Park Management Plan; or,
- ii. Make no changes to non-residential zoned land at this time.

OTHER INFORMATION

Budget

In order to receive the funds from the Canadian Mortgage and Housing Corporation Housing Accelerator Fund, the Town must provide evidence of completing milestones that relate to the 5 key initiatives that were included in the submitted Housing Action Plan. Pursuing the tactics that incentivize the creation of new accessory dwelling units would meet one of the noted milestones. In addition to meeting milestones related to the initiatives, funding is also directly related to the number of new dwellings that have been approved because of changes within a 3-year period.

Specific budget allocations for Housing are embedded in a number of service areas (see "Internal Resources"). Should the Town receive word of a successful application to the Housing Accelerator Fund, administration will be returning with a report on the proposed allocation of grant funding towards existing service areas, capital projects, and / or new initiatives related to housing. At the June 26, 2023 Council approved up to \$100,000 to begin this work.

Administration recommends that the accessory dwelling tactics outlined in this report should be implemented, regardless of whether the Housing Accelerator Fund application is successful. In the recommendations of this report, it is identified that administration will return at Service Review with a new service level request, should the tactics that require an increased level of service be approved. There are no budget implications for returning with amendments to the Land Use Bylaw.

Internal Resources

Housing as a Service Area is addressed in multiple departmental functions. The housing working team includes administrative staff from Community Services, Planning and Environment, Engineering, and Corporate Services. The tactics identified in the recommendations would be predominantly administered through Planning and Environment.

Communication

A community consultation process would occur prior to consideration of Bylaw amendments. Additionally, any Land Use Bylaw amendments require a public hearing which is advertised in the Rocky Mountain Outlook as well as through www.banff.ca and social media.

Banff Community Plan

Social

Housing goals:

- *To supply a mix of affordable housing options to ensure those working in Banff live in Banff.*
- *Ensure high standards for architecture, landscape architecture, environmental and urban design in residential development and redevelopment.*
- *Respect neighbourhood character that personifies and reinforces Banff's sense of place.*

Housing objectives:

- *Monitor and adjust the densities in residential areas to provide for a sufficient number of dwellings to satisfy the community need.*
- *Review guidelines for infill housing in high density residential neighborhoods.*
- *Continue to mandate the provision of required housing in all new commercial developments.*
- *Ensure new housing developments provide community amenities, public space and parks.*
- *Review guidelines for infill housing in high density residential neighborhoods.*

Character and heritage goal:

- *Ensure all new development and redevelopment incorporates the highest quality architecture, landscape architecture, environmental and urban design that is complimentary to its location and surrounding context.*

Council Strategic Priorities

Better Banff For Residents – Addressing affordability and Livability in Banff

Banff is vibrant and connected community with a mandate as a service centre for Banff National Park visitors. As we continue to welcome the world, we will focus on enhancing quality of life for those who call Banff home.

- *Create the conditions that will provide a mix of affordable housing options to ensure those working in Banff can live in Banff.*
- *Stimulate accessibility and affordability initiatives for residents.*

Legislation/Policy

Banff National Park of Canada Management Plan (2022)

Key Strategy 9: *Park Communities: Housing for eligible residents is a challenge in both communities. While it is not anticipated that all of the housing requirements will be addressed within the two communities, providing affordable housing for eligible residents—supported by sustainable land use and transportation planning—will continue to be a priority.*

7. Management Areas – 7.1 *Town of Banff: Over the next decade, areas of attention for the Town of Banff include: achieving housing for eligible residents whose needs are not currently being met through the market;*

Objective 7.1.1 – *Targets: To ensure the available space and character of residential land use districts is maximized for use as housing by eligible residents:*

- *where commercial use (e.g. a bed and breakfast inn, eating and drinking establishment or service station) is the principal use of a site in a residential land use district, any increases in the gross floor area are prohibited, as is relocation, assignment or transfer of these commercial uses to another parcel not located in a commercial land use district;*
- *a maximum number of home occupation businesses that will be permitted (including bed and breakfast homes and bed and breakfast inns) in residential land use districts is established by the municipal government; and*
- *bed and breakfast inns that were not in operation and continuously licensed by Parks Canada for a period of not less than five consecutive years prior to January 2, 1990, are not permitted, nor are those that have had a cessation of 12 months or more in their operation and/or licensing.*

ATTACHMENTS

Attachment 1 – Illustrations of Terminology – Setbacks, Site Coverage and Floor Area Ratio

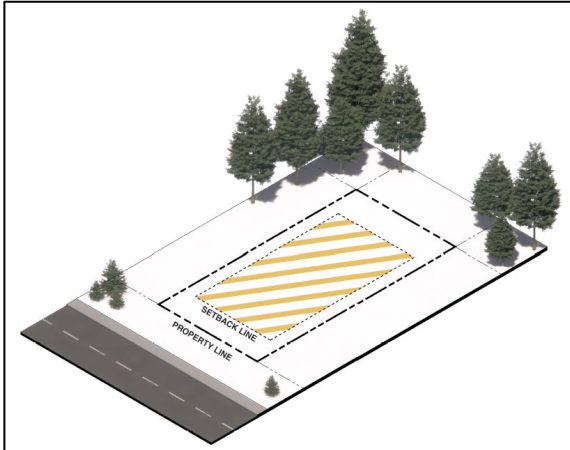
Circulation date: November 20, 2023

Submitted By: Dave Michaels
Manager, Planning Services

Reviewed By: Kelly Gibson
Town Manager

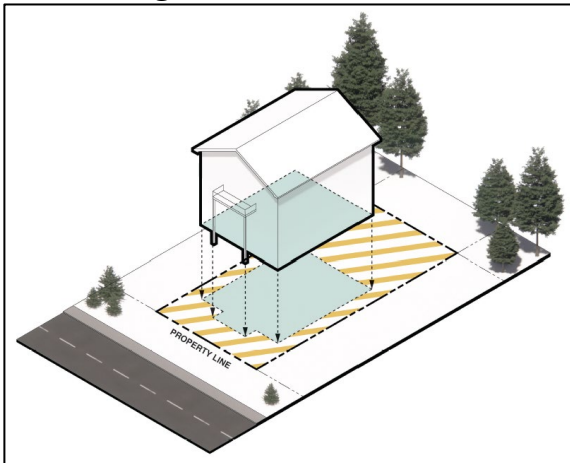
Attachment 1 – Illustrations of Terminology

Setbacks



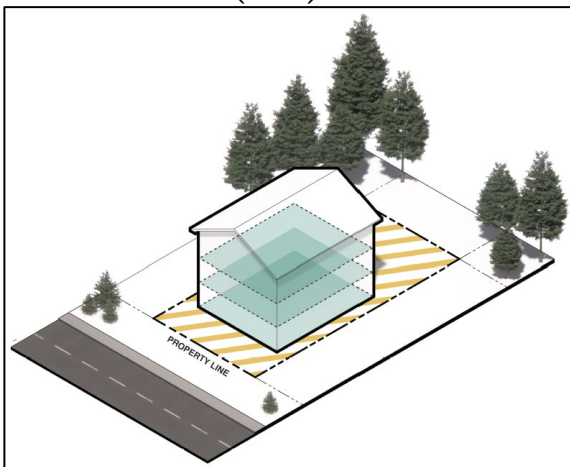
Property line setbacks are a fundamental aspect of the Land Use Bylaw. They play a crucial role in ensuring privacy for neighbors, providing emergency access around buildings, and preserving sunlight exposure for adjacent structures. Setbacks are typically categorized into Front Setbacks (from the road), Side Setbacks (from neighboring properties), and Rear Setbacks. Each serves a distinct purpose, and their specific measurements vary across different areas of Banff.

Site Coverage



Site coverage is the area of a property covered by development, including building footprints and structures. Regulations are in place to address stormwater concerns and control building form and design flexibility. Allowing more site coverage provides landowners with greater flexibility for renovations or redevelopment. However, as allowed site coverage increases, on-site stormwater management capacity decreases. To address this, one solution is to mandate the installation of on-site stormwater management systems.

Floor Area Ratio (FAR)



FAR dictates the permissible building size on a property. It is the ratio of the total floor area to the total site area. For instance, an FAR of 1.0 would enable you to construct a building with a total floorspace equal to the area of your lot. Our Bylaw uses FAR, along with height and setbacks, to set a maximum limit on total building floorspace. FAR allows design flexibility while serving as a quantitative cap on building size. A shortage of residential units has been highlighted in independent housing studies and community feedback. Addressing this challenge is crucial due to ongoing population growth. One effective approach is to boost Floor-Area-Ratio (FAR) and promote redevelopment.

Residential Density

NOVEMBER 29, 2023



GOVERNANCE AND FINANCE

Reason for Report

- Specific responses to Council Motions
- Action one of the five initiatives outlined in the Housing Accelerator Fund Action Plan



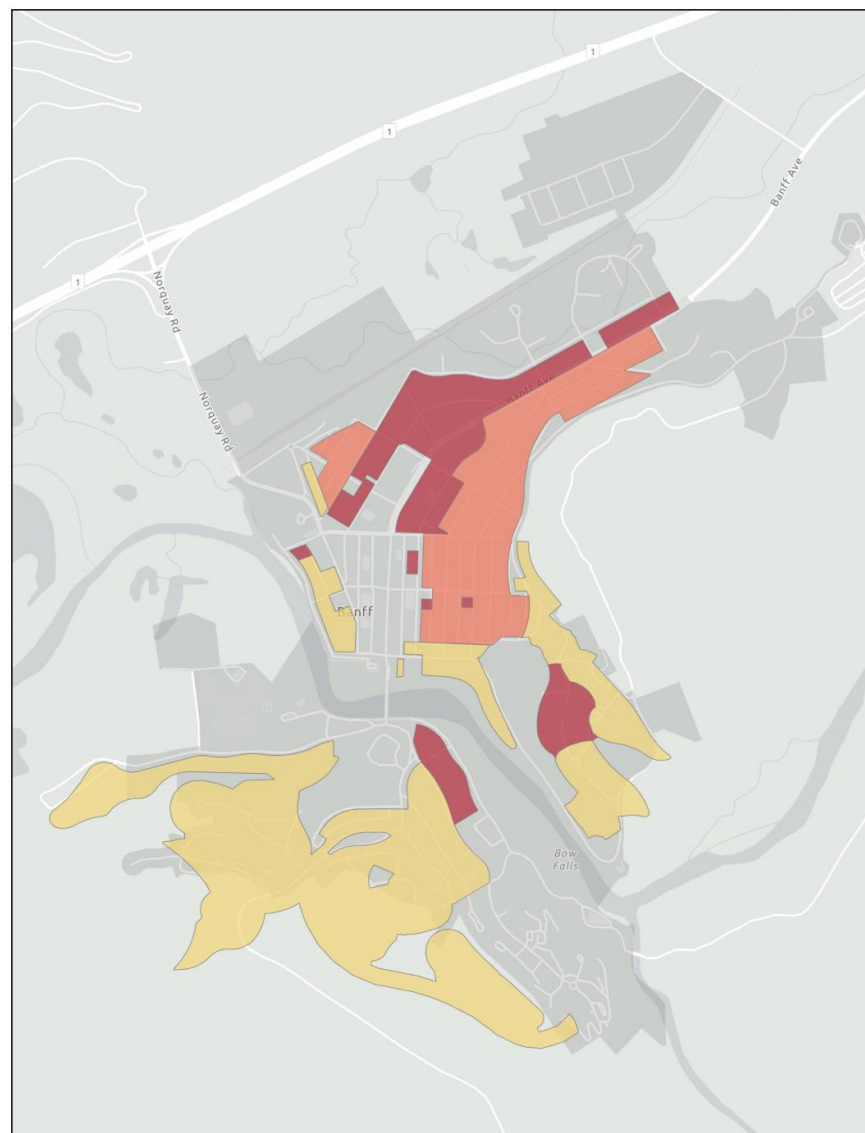
Land Use Bylaw is No. 1 tool for implementing and achieving Banff's desired outcomes

Background of Zoning and Districts

1956

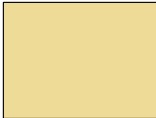
Residential Zones

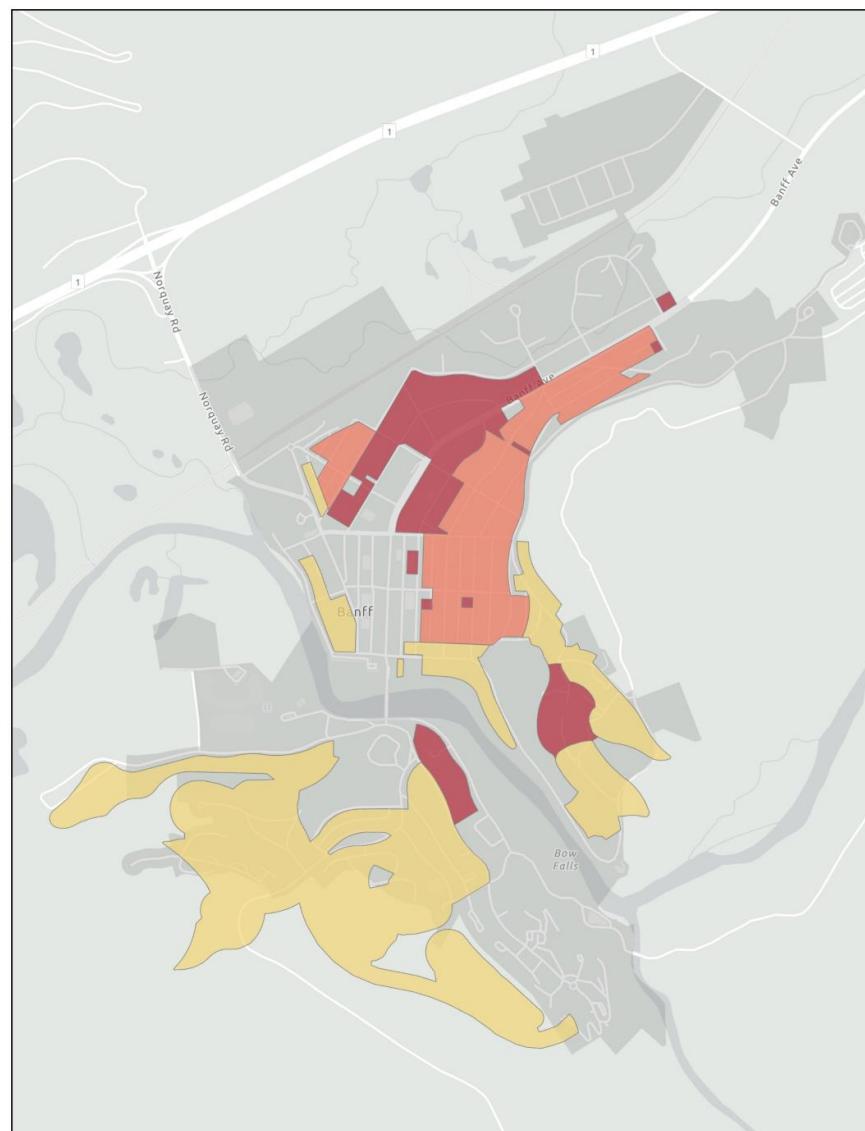
-  **Class A Residential Zone**
(Single Detached Housing)
-  **Class B Residential Zone**
(Duplex Housing)
-  **Multiple Dwelling and Institutional**
(Apartment)



1965

Residential Zones

-  **Class A Residential Zone**
(Single Detached Housing)
-  **Class B Residential Zone**
(Duplex Housing)
-  **Multiple Dwelling and Institutional**
(Apartment)



1990

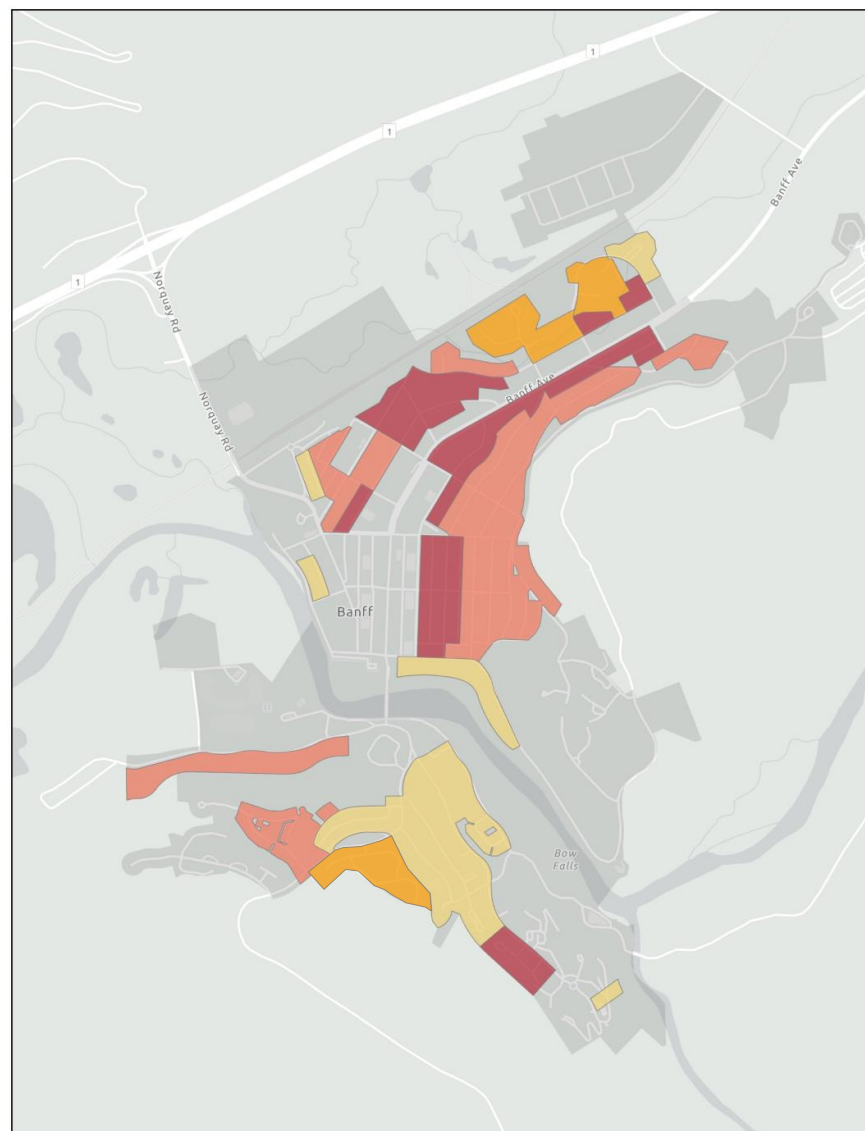
Residential Districts

 **R1**
(Single Detached Housing)

 **R2**
(Duplex Housing)

 **R3**
(Row Housing)

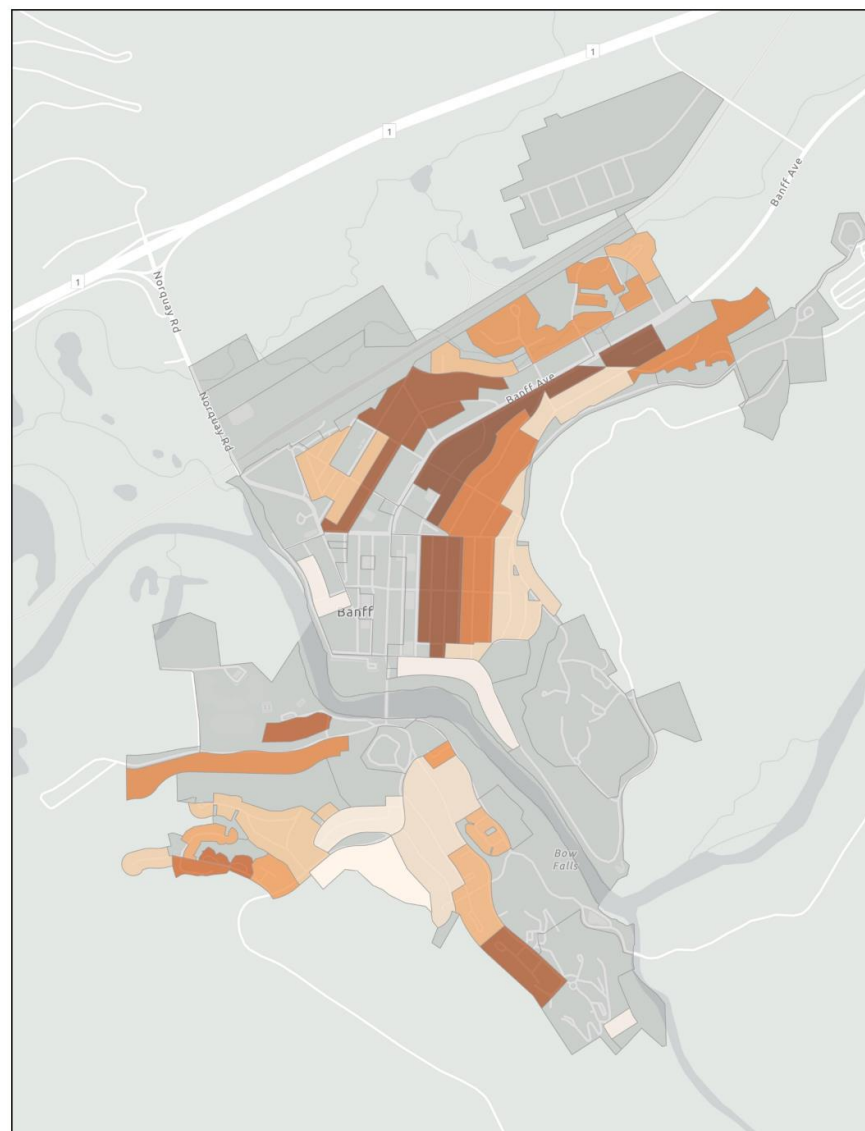
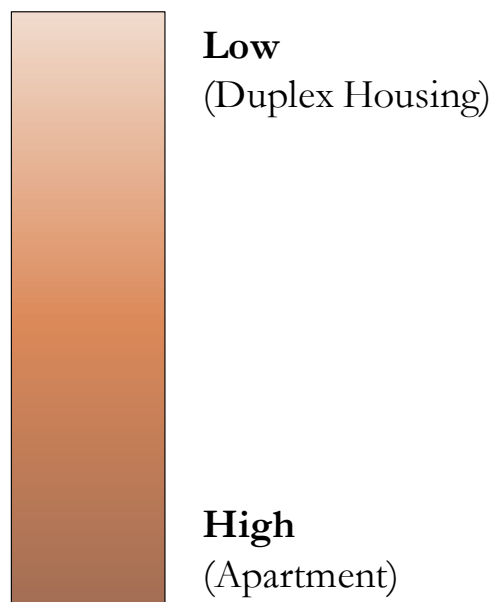
 **R4**
(Apartment)



Today

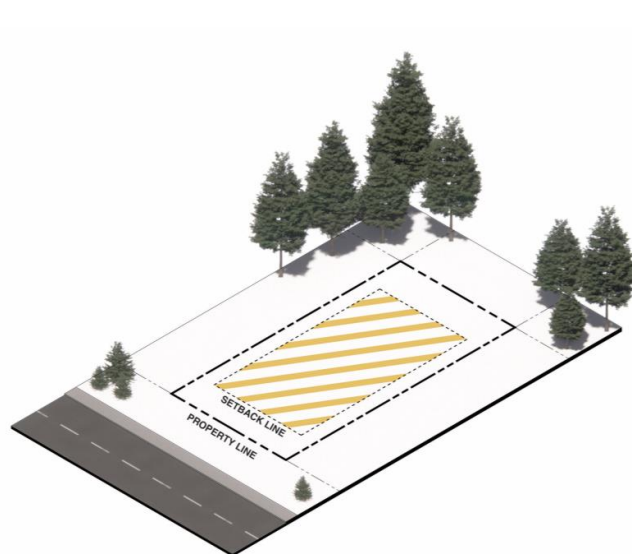
Residential Districts

- 18 Land Use Districts in 1992
- 24 Separate and distinct residential Land Use Districts

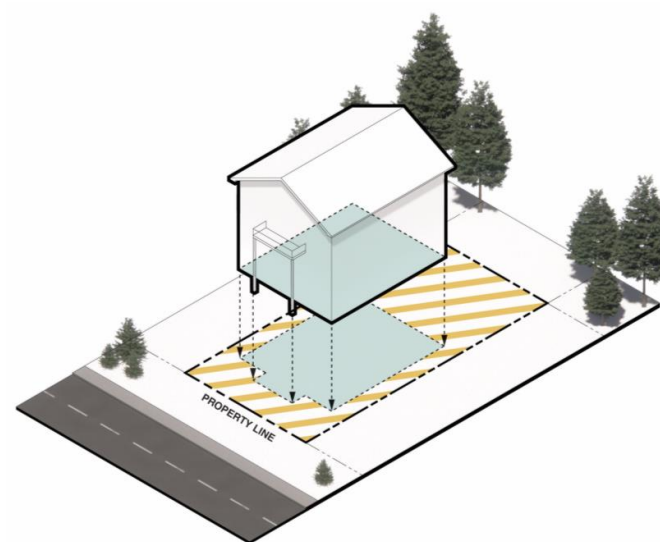


Development Regulations

Building Form



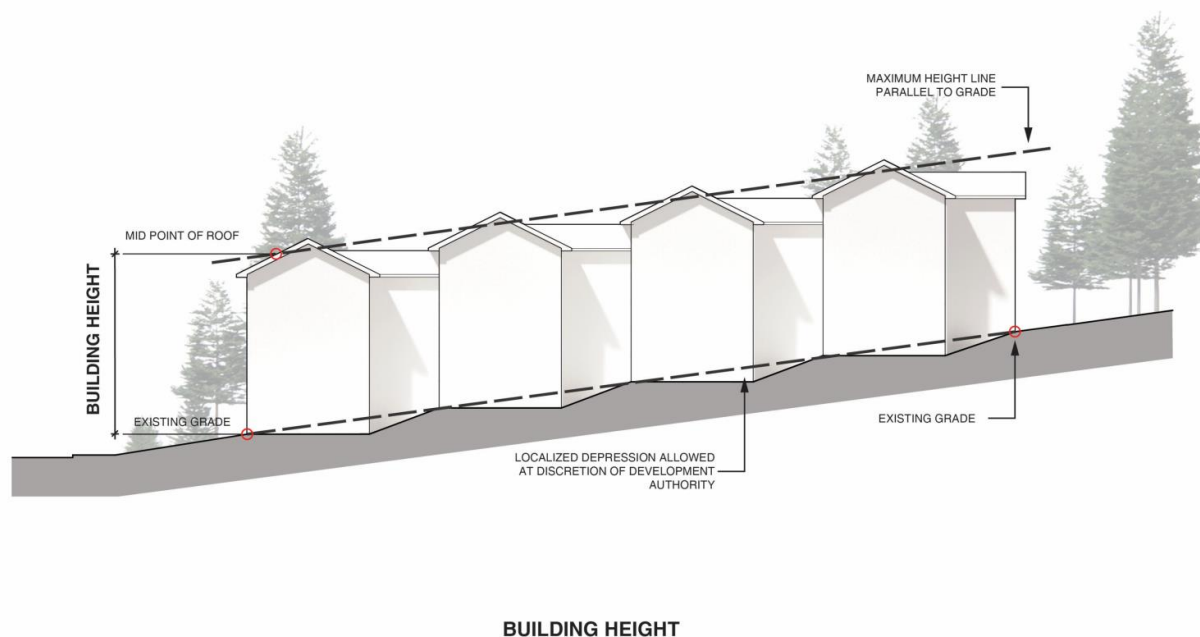
SETBACK LINE



SITE COVERAGE

Development Regulations

Building Form

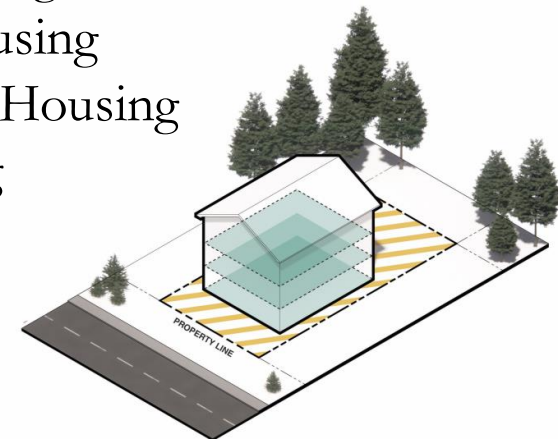


Development Regulations

Building Function



- Accessory Dwellings
- Apartment Housing
- Single Detached Housing
- Duplex Housing
- Triplex Housing
- Fourplex Housing
- Stacked Row Housing
- Row Housing



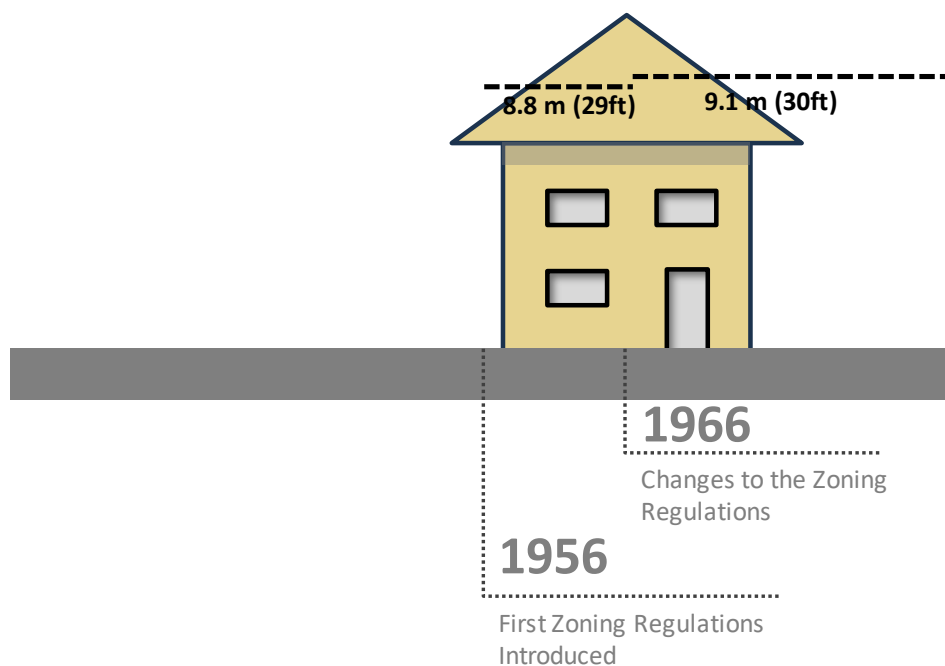
FLOOR AREA RATIO (FAR)

Changes over time

- Last full-scale amendments of residential districts was 2012
- Minor amendments to:
 - Parking for apartment housing
 - General housing requirements
- Typically have increased opportunity for residential development

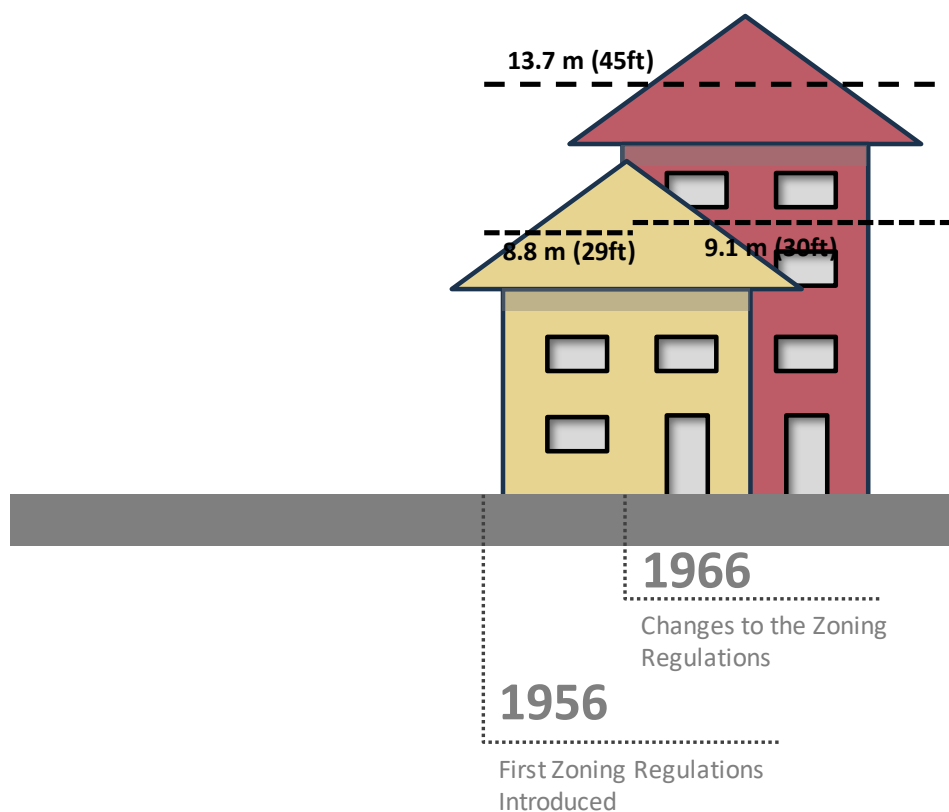
Development Regulations

Building Form



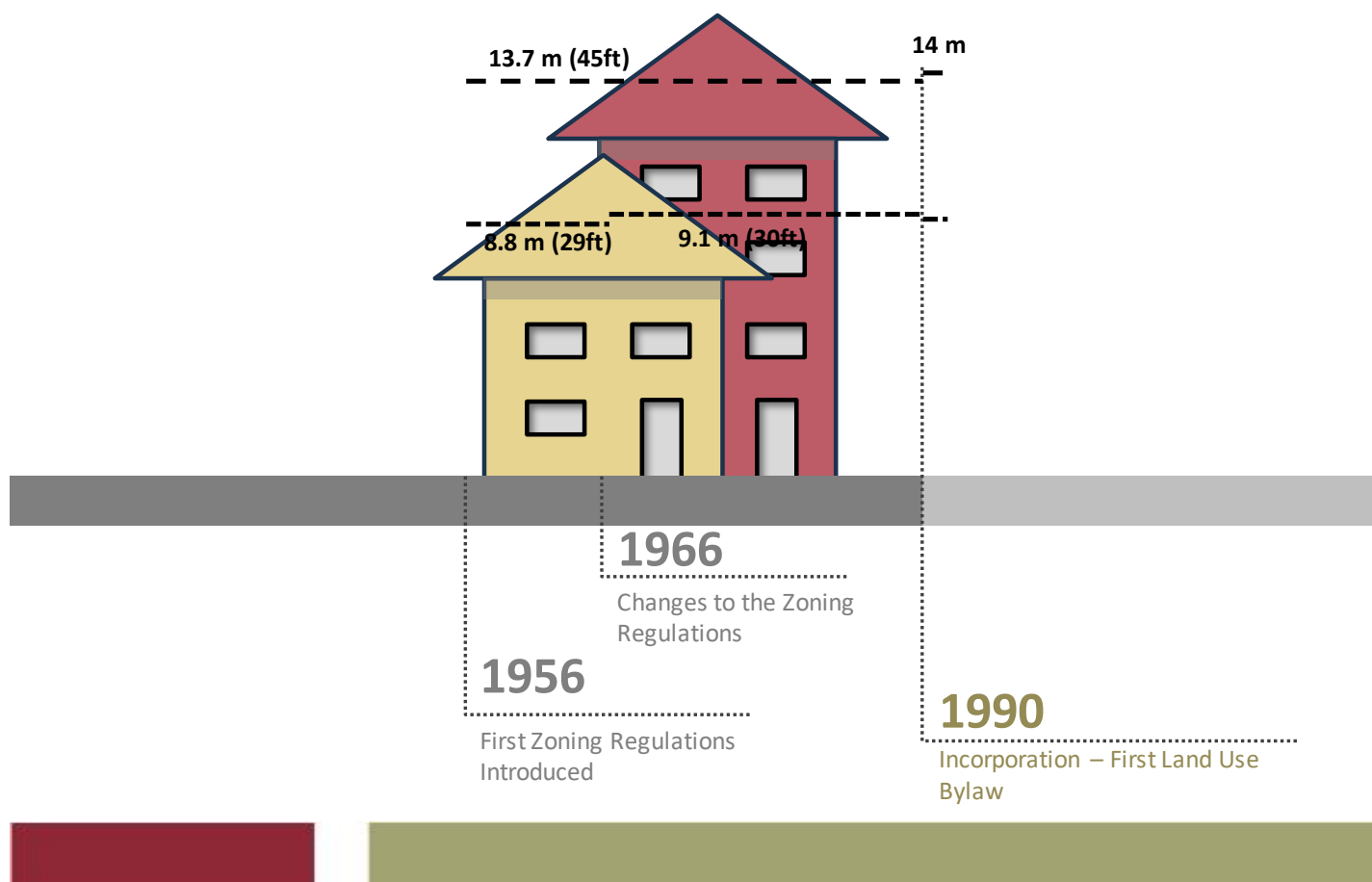
Development Regulations

Building Form



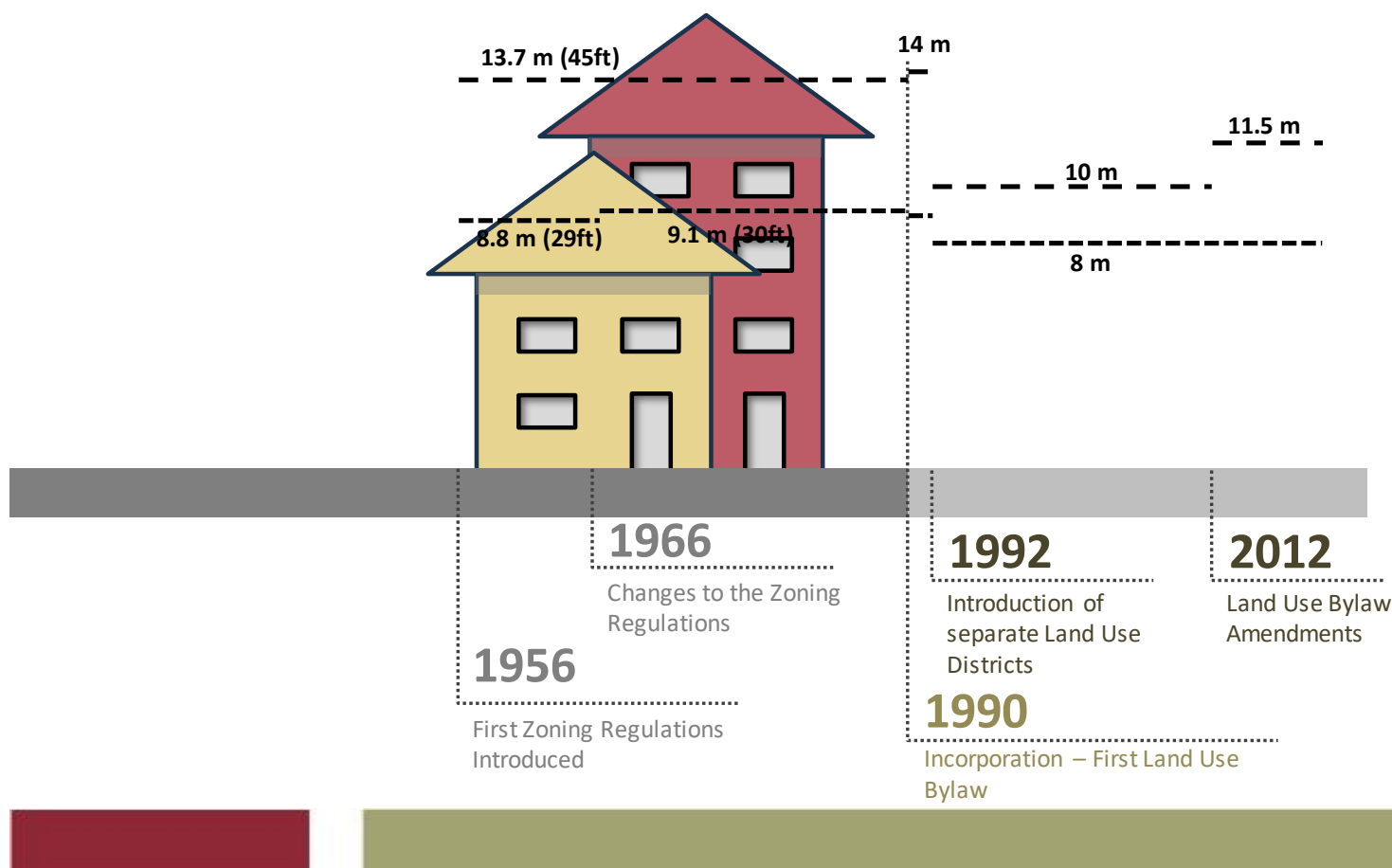
Development Regulations

Building Form



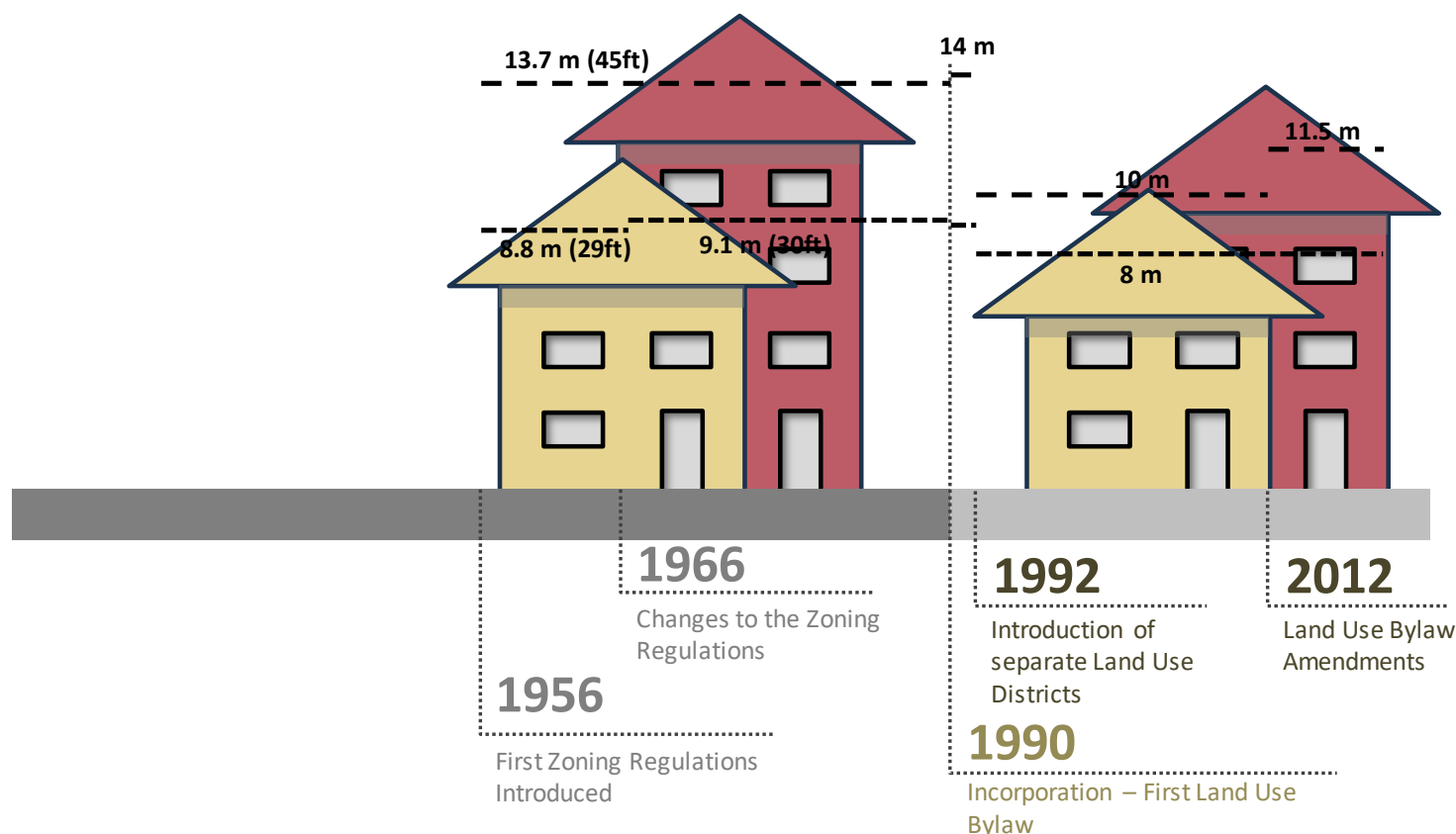
Development Regulations

Building Form



Development Regulations

Building Form



What are our options?



1a. Development Regulations Simplify

- Development Regulations consist of:
 - Use
 - Density (Floor Area Ratio)
 - Site Coverage
 - Height
 - Setbacks
- 24 current Land Use Districts, only 2 have same Development Regulations

1a. Development Regulations Simplify



1a. Development Regulations Simplify

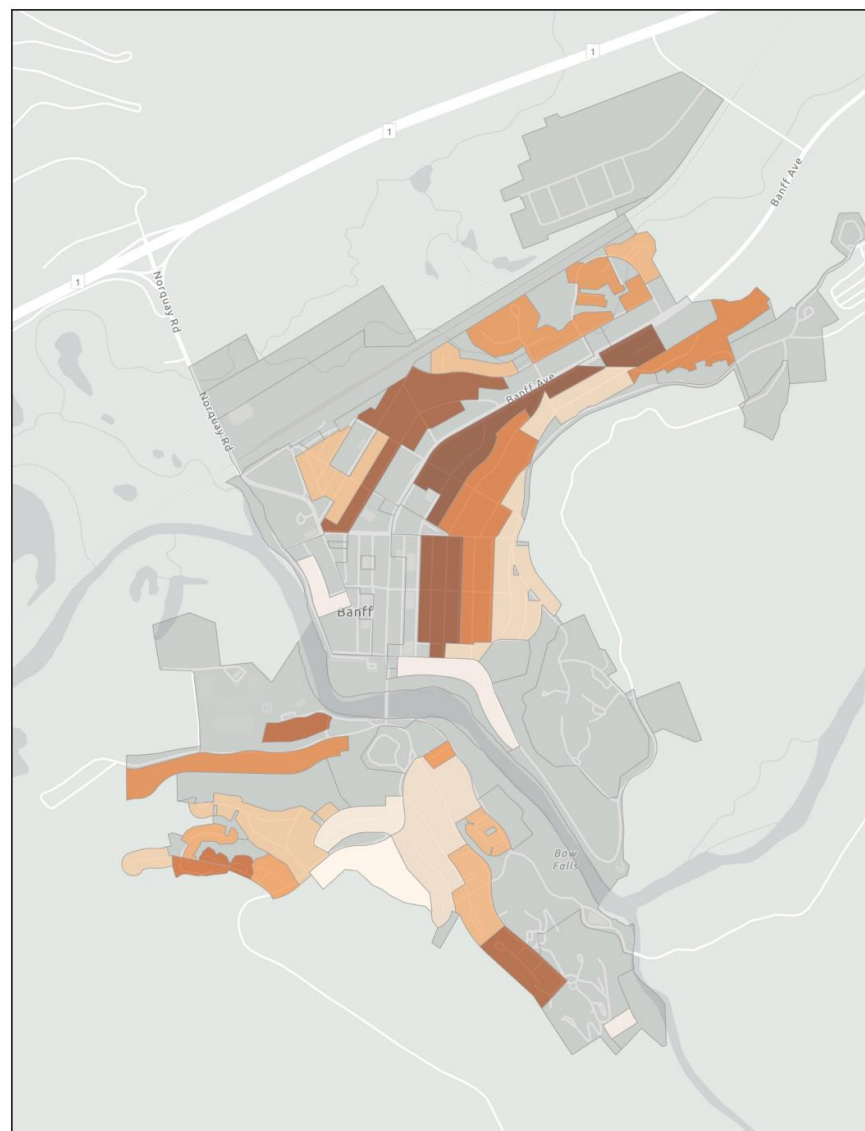
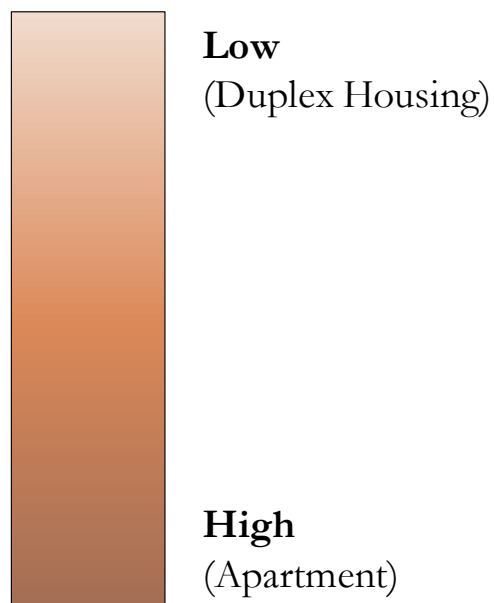


Muskrat Street: Banff Avenue to Buffalo St passes through 5 different districts

Today

Residential Districts

24 Separate and distinct residential
Land Use Districts



The Future?

Simplify



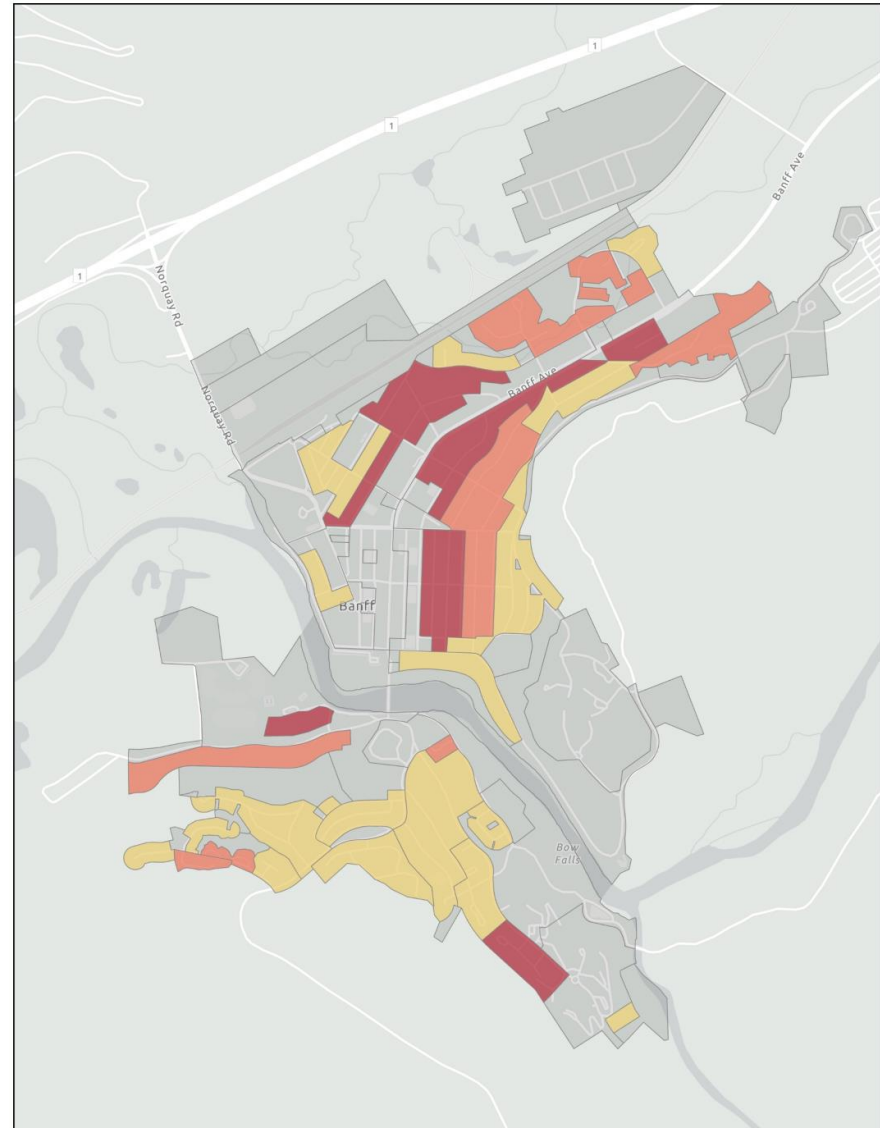
High Density



Medium Density



Low Density



High Density Simplify

Current Development Regulations

Highest Density Uses

Apartment

Maximum Density

Ranges from 0.8 to 1.3

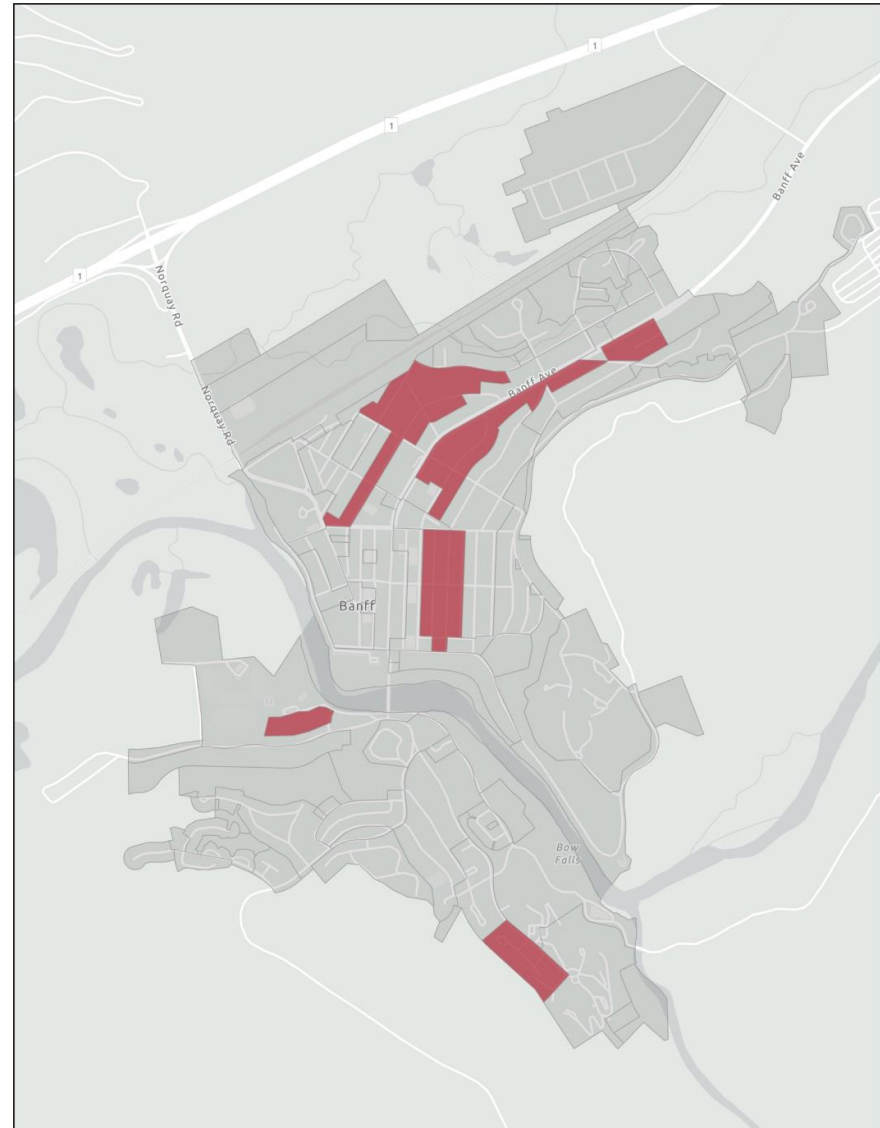
Maximum Height

Ranges from 9 m to 14 m with most being 11/11.5 m

9 m - 100/200 Blocks of Muskrat St, and sections of Rabbit St and Squirrel St
14 m - Banff Springs District

Historical Context

The majority of these areas were zoned as the highest density residential zones prior to, and just after, incorporation that allowed a maximum height of 45 ft (13.7 m)



Examples of existing apartment housing in these districts



444 Cougar St – 1988
Approximately 13 m - 4 stories



404 Banff Ave – 1978
Approximately 12 m - 4 stories



220 Muskrat St – 1988
Approximately 13 m - 3.5 stories

Potential Changes to the Development Regulations

- Maintain Apartment Housing as a permitted use across these districts
- Allow for a maximum height of 14.5 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 1.3 for Apartments across these districts
- Introduce a minimum required number of units per lot
- Reduce minimum setbacks

Medium Density Simplify

Current Development Regulations

Highest Density Uses

Row Housing and Fourplex as permitted uses
and Apartments and Stacked Row as
discretionary uses

Maximum Density

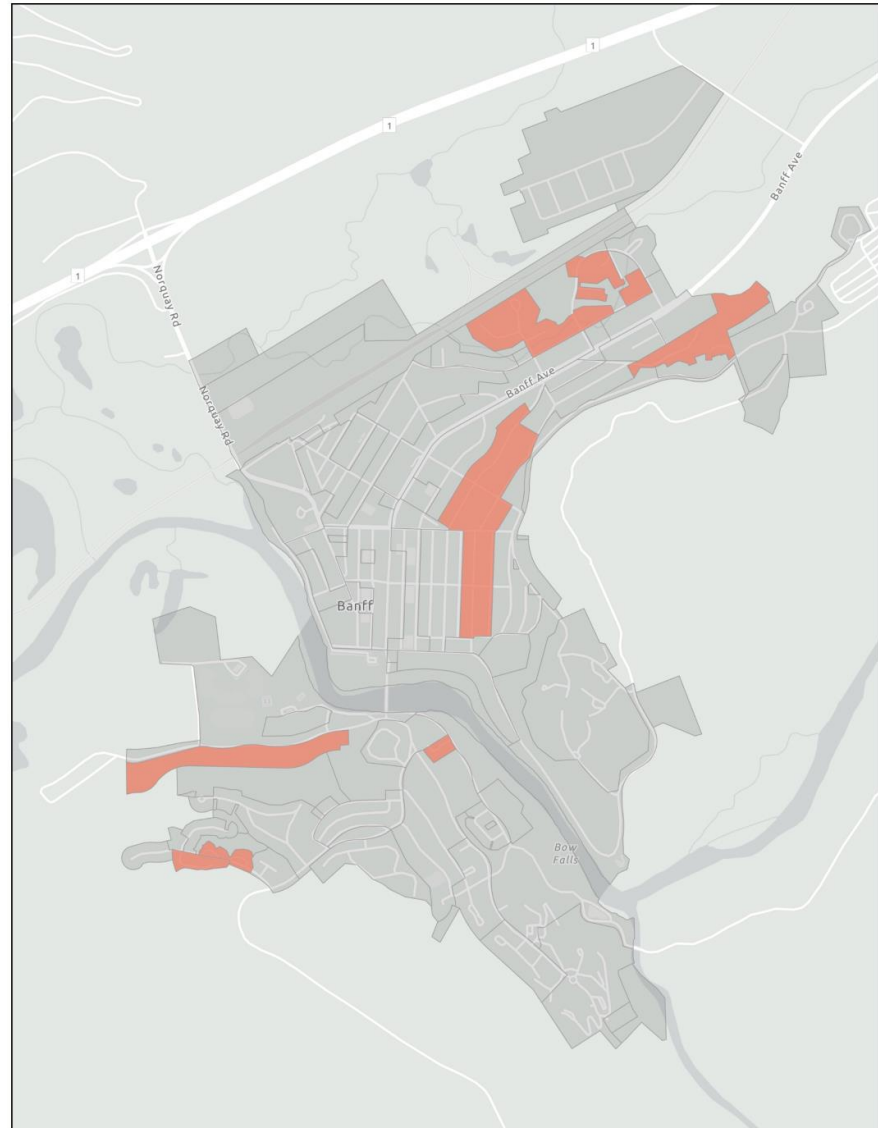
Ranges from 0.5 to 1

Maximum Height

9 m or 10 m

Historical Context

This includes some older areas along Cave Avenue and the 100/200/300 blocks of Muskrat along with Row Home developments on Marmot Crescent, Sundance Court and Tatanga. This area also includes some existing Apartment buildings that couldn't be rebuilt under today's Land Use Bylaw.



Examples of existing medium density housing in these districts



113 Cave Ave
19 Homes



100 Whiskey Jack Cres
8 Homes



2 Otter Lane
6 Homes

Potential Changes to the Development Regulations

- Make Row/Stacked Row Housing a permitted use across these districts and amend the associated definitions
- Allow for a maximum height of 11.5 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 1.0 across these districts
- Introduce a minimum required number of units per lot

Low Density Simplify

Current Development Regulations

Highest Density Uses

Row Housing, Fourplex and Duplex with Accessory Dwellings

Maximum Density

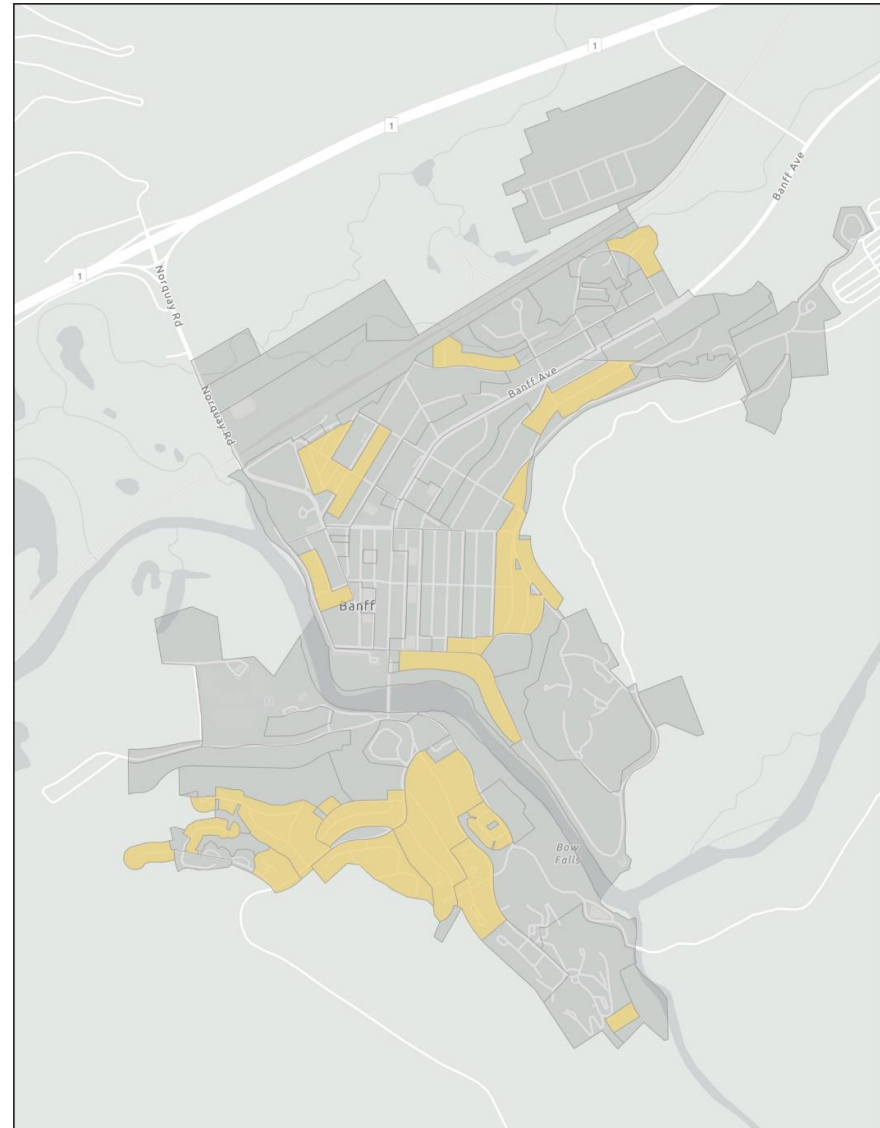
Ranges from 0.45 to 0.8

Maximum Height

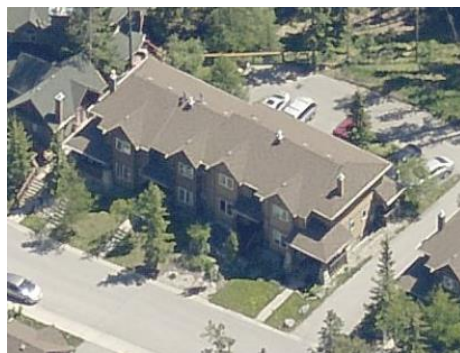
Majority 9 m with one district at 8 m and one at 10 m

Historical Context

Includes older low density areas including Kootenay Ave, Spray Ave, Bow Ave, Buffalo St and Marmot Place as well as Valley View and the majority of Middle Springs.



Examples of existing housing of varying densities in these districts



Fairholme Place
4 Homes



318 Squirrel St
4 Homes



1 Kootenay Ridge
2 Homes

Potential Changes to the Development Regulations

- Allow Fourplex Housing as a permitted use across these districts (Currently 4 units are allowed per lot, but in a “Duplex with suites” configuration)
- Allow for a maximum height of 10 m across these districts
- Allow for a maximum density (Floor Area Ratio) of 0.8
- Introduce a minimum required number of units per lot

High Density

Medium Density

Low Density

[illegible]

1a. Development Regulations – Options to Simplify

Direct administration to draft Land Use Bylaw amendments that standardize and simplify development regulations to create high, medium and low density scenarios which includes:

- i. An amendment to the Land Use District map to include three residential zones; or,
- ii. Applying the same regulations for each density scenario to the existing Land Use Districts

Changes to the Development Regulations would include:

- Site Coverage
- Setbacks
- Permitted and Discretionary Uses including amendments to the residential use definitions
- Reduced Floor Area Ratio for lower density development
- Allowable projections into setbacks

Take into account the objectives of the Banff Design Guidelines

2. Development Regulations Additional Options

- Removing Single Detached Housing as an Allowable Use
- Introduce a maximum dwelling unit size for all housing types
 - Minimum and Maximum unit size currently exists for some uses in some districts

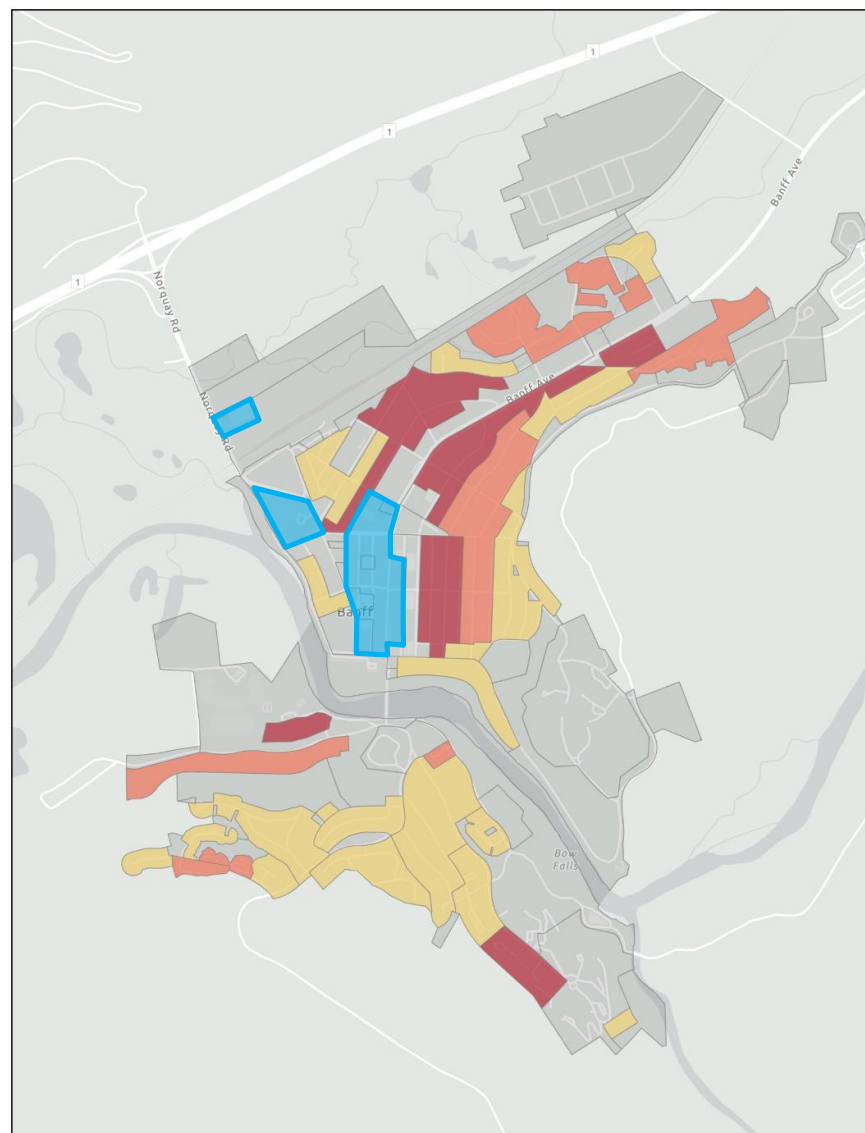
2. Development Regulations – Additional Options

- i. Direct administration to include the removal of minimum and maximum dwelling size with any Land Use Bylaw amendments;
- ii. Direct administration to include amendments to the development regulations to remove Single Detached Housing as an allowable use; or,
- iii. Direct administration to include amendments to the development regulations to introduce a maximum dwelling unit size for all housing types.

3. Amending the Boundaries of Existing Residential Land Use Districts

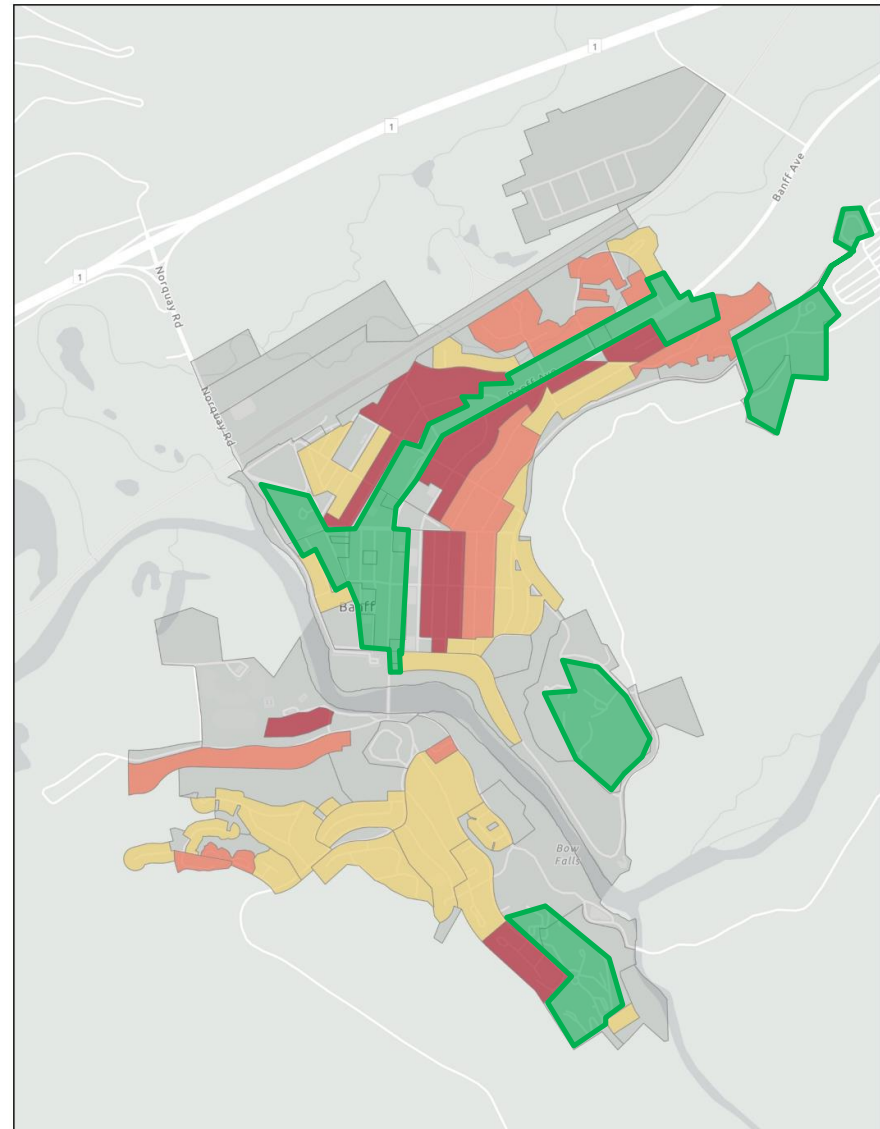
Land Use District Review Criteria

- Is the subject area especially close to public, commercial and institutional services;



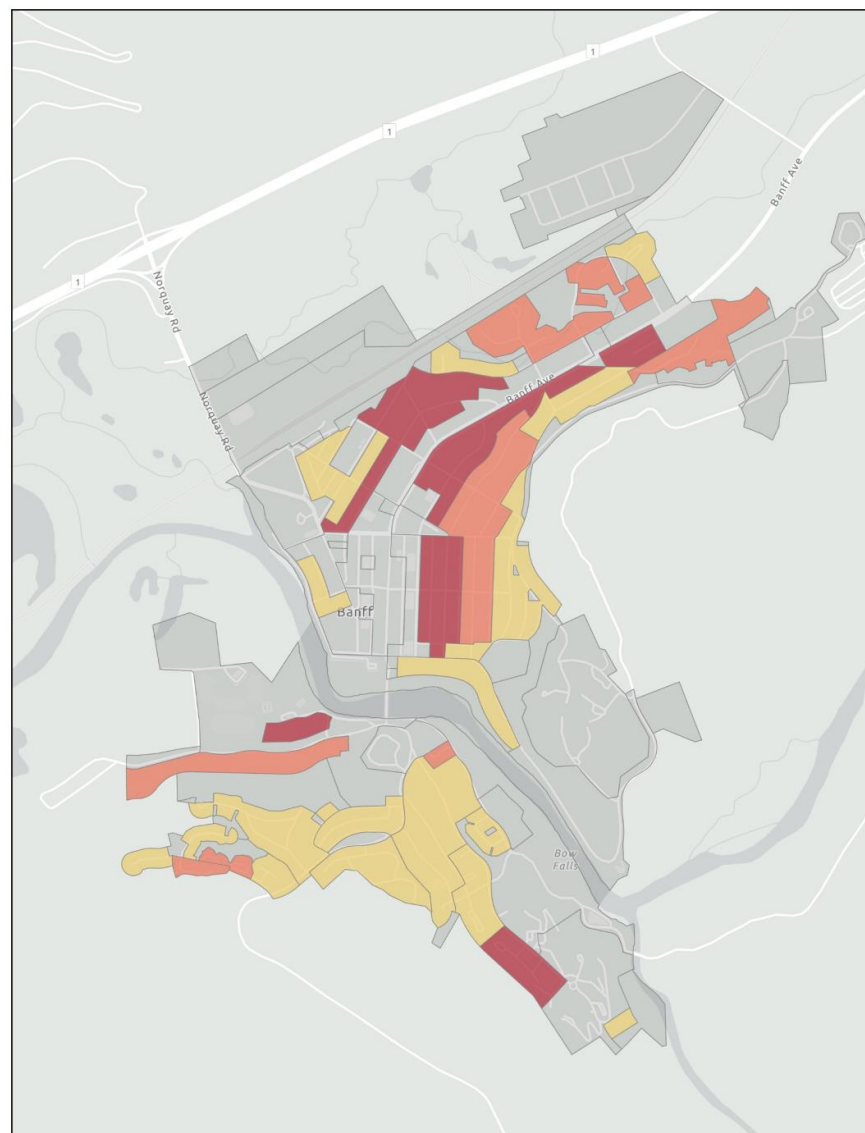
Land Use District Review Criteria

- Is the subject area especially close to public, commercial and institutional services;
- Is the subject area in close proximity to employment centres;



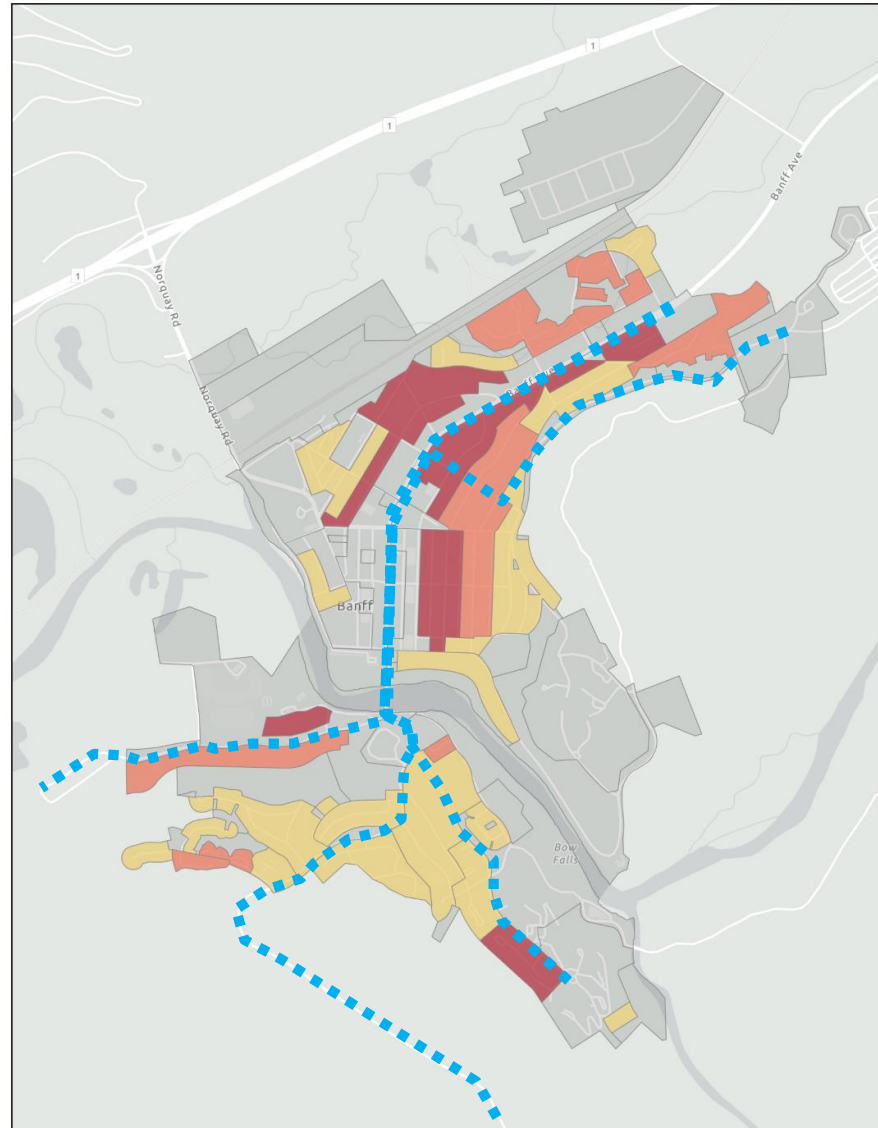
Land Use District Review Criteria

- Is the subject area especially close to public, commercial and institutional services;
- Is the subject area in close proximity to employment centres;
- Does the subject area reflect an abrupt transition between groupings (ie. land use districts that are part of the High Density grouping are directly adjacent to those that are part of the Low Density grouping);



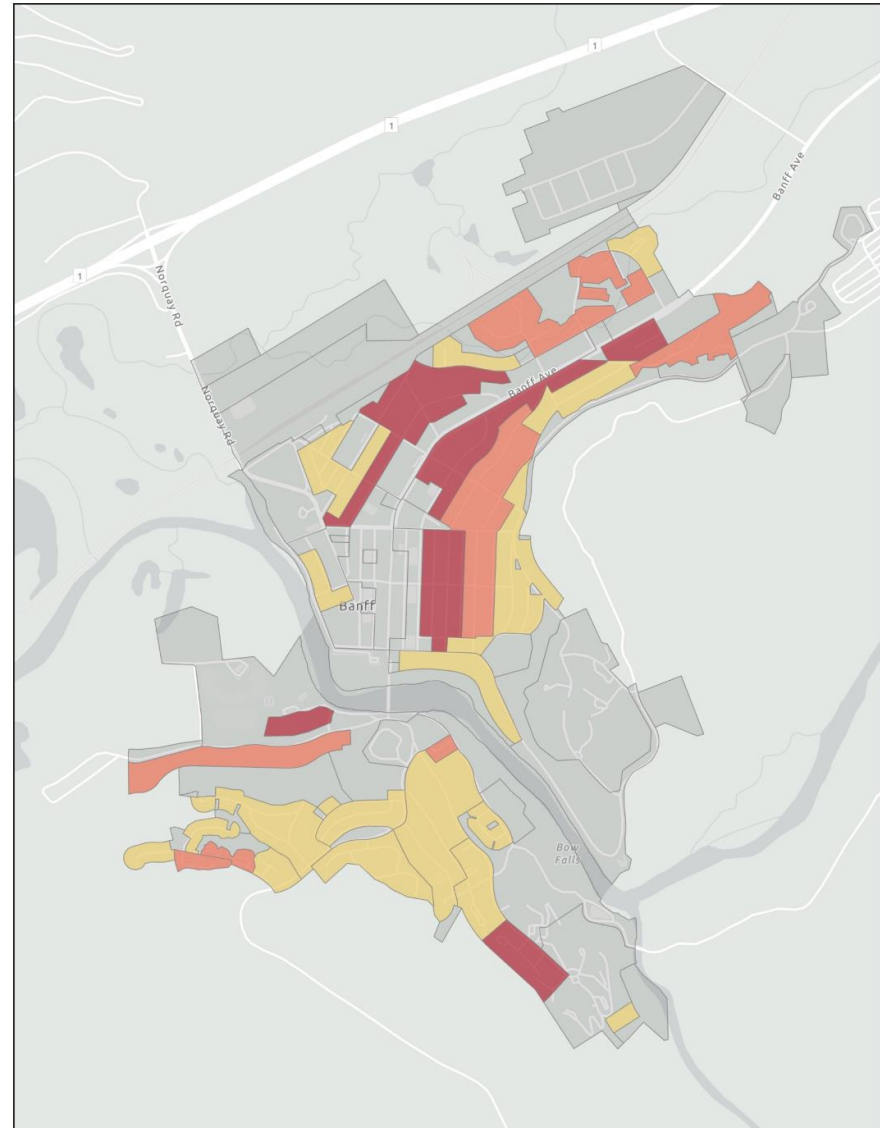
Land Use District Review Criteria

- Does the subject area have strong transportation connectivity for all modes that allows residents access to services, jobs, etc.;



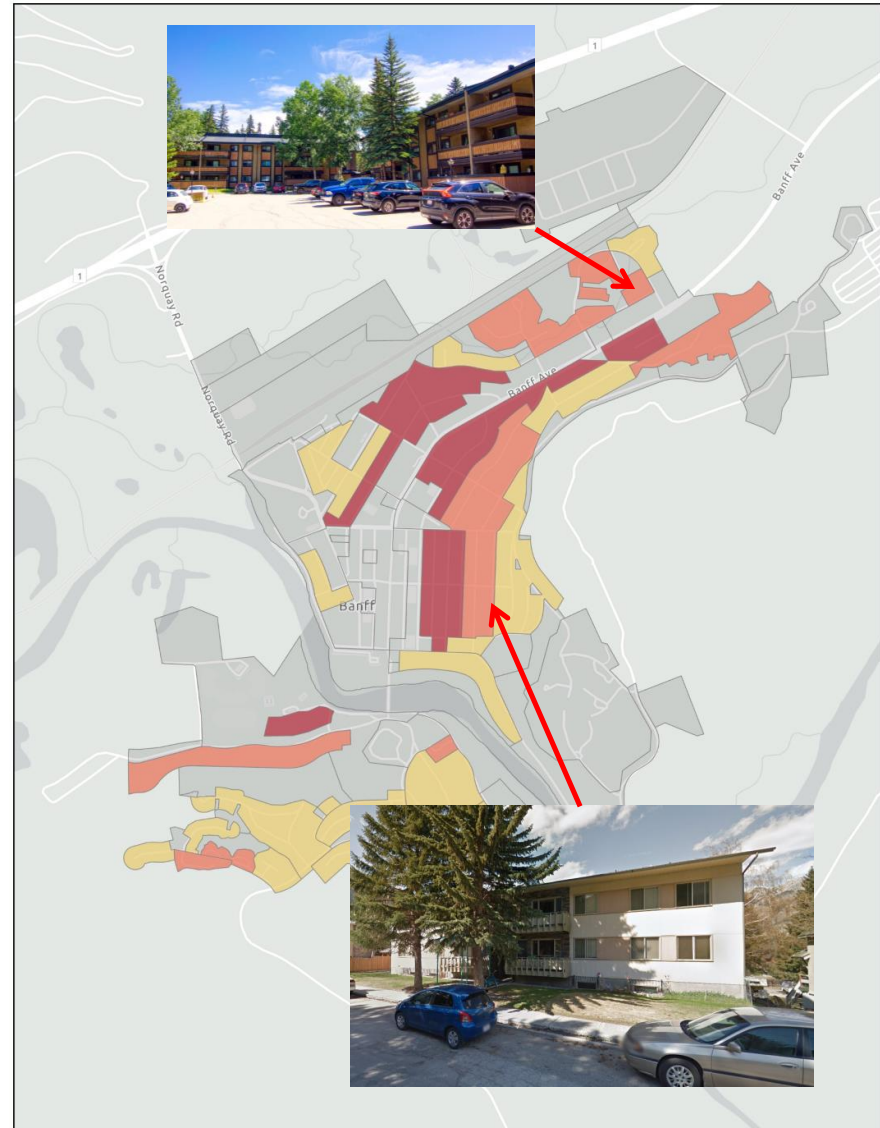
Land Use District Review Criteria

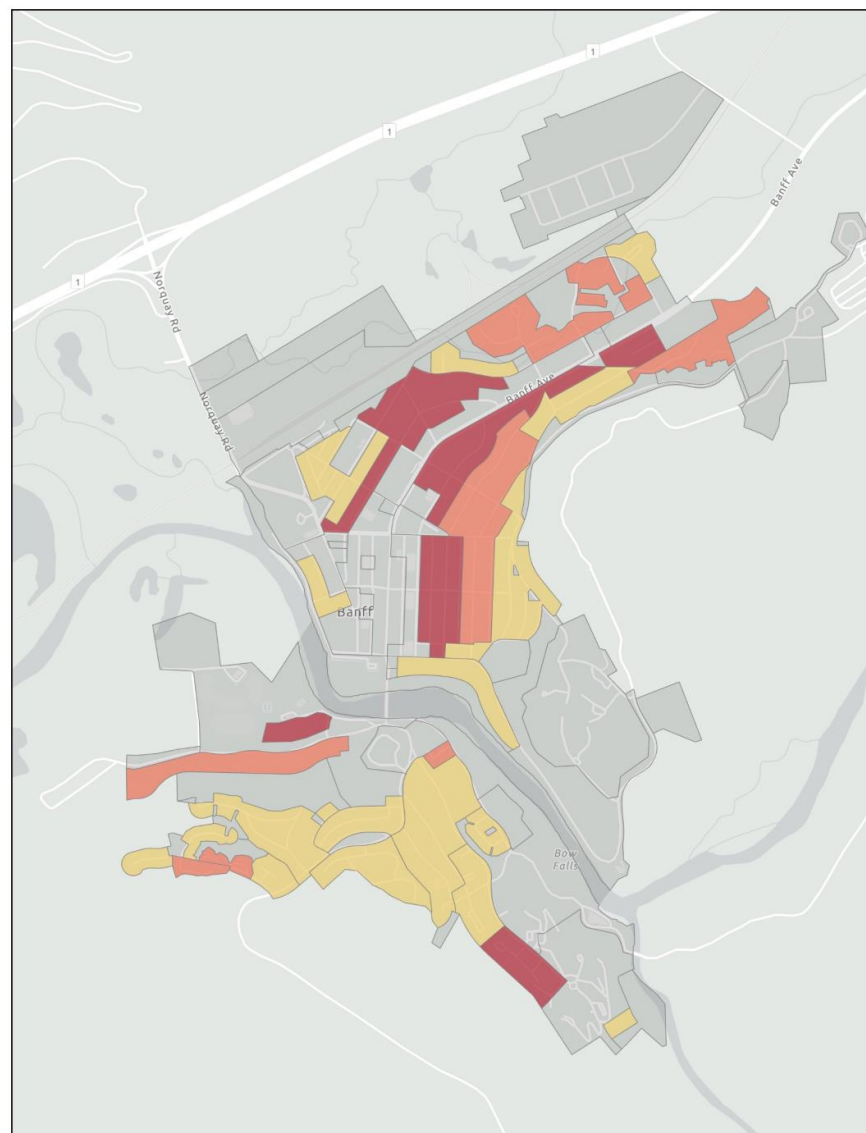
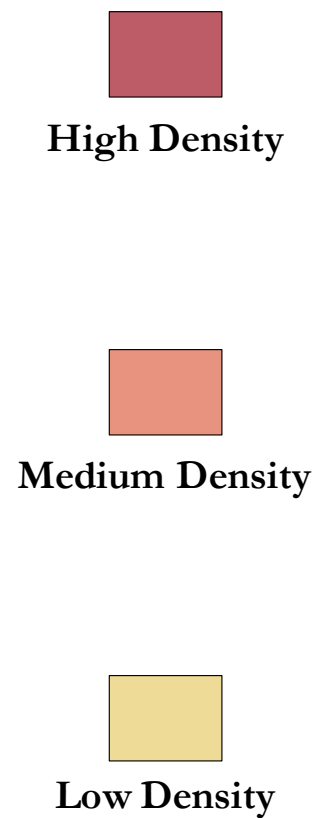
- Does the subject area have strong transportation connectivity for all modes that allows residents access to services, jobs, etc.;
- Is the subject area already similar in nature to another district which is already in a higher density grouping; and,

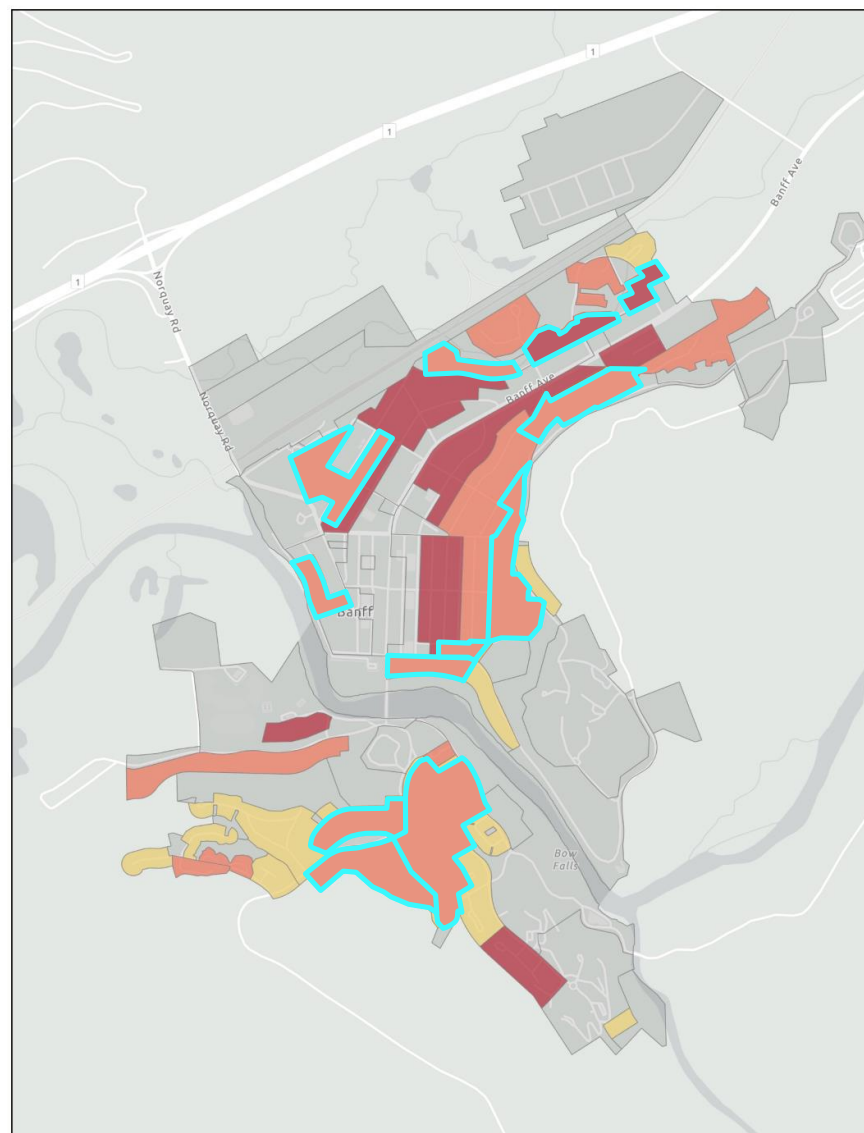
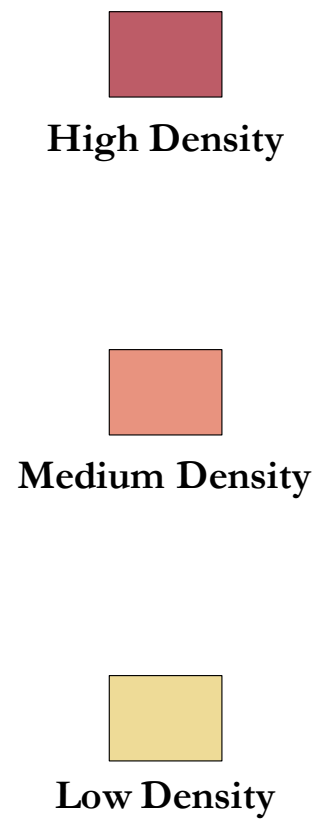


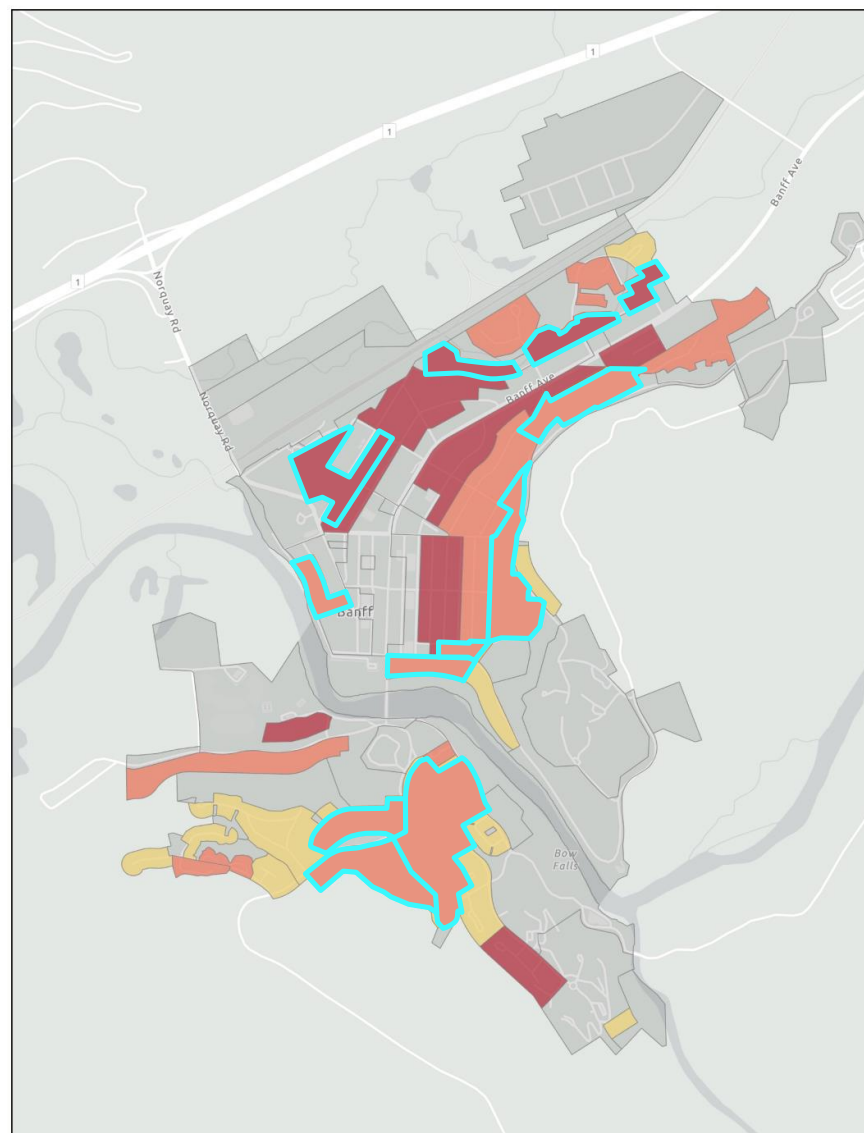
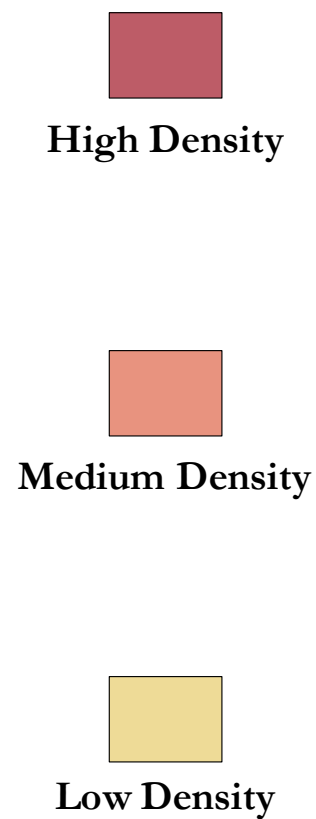
Land Use District Review Criteria

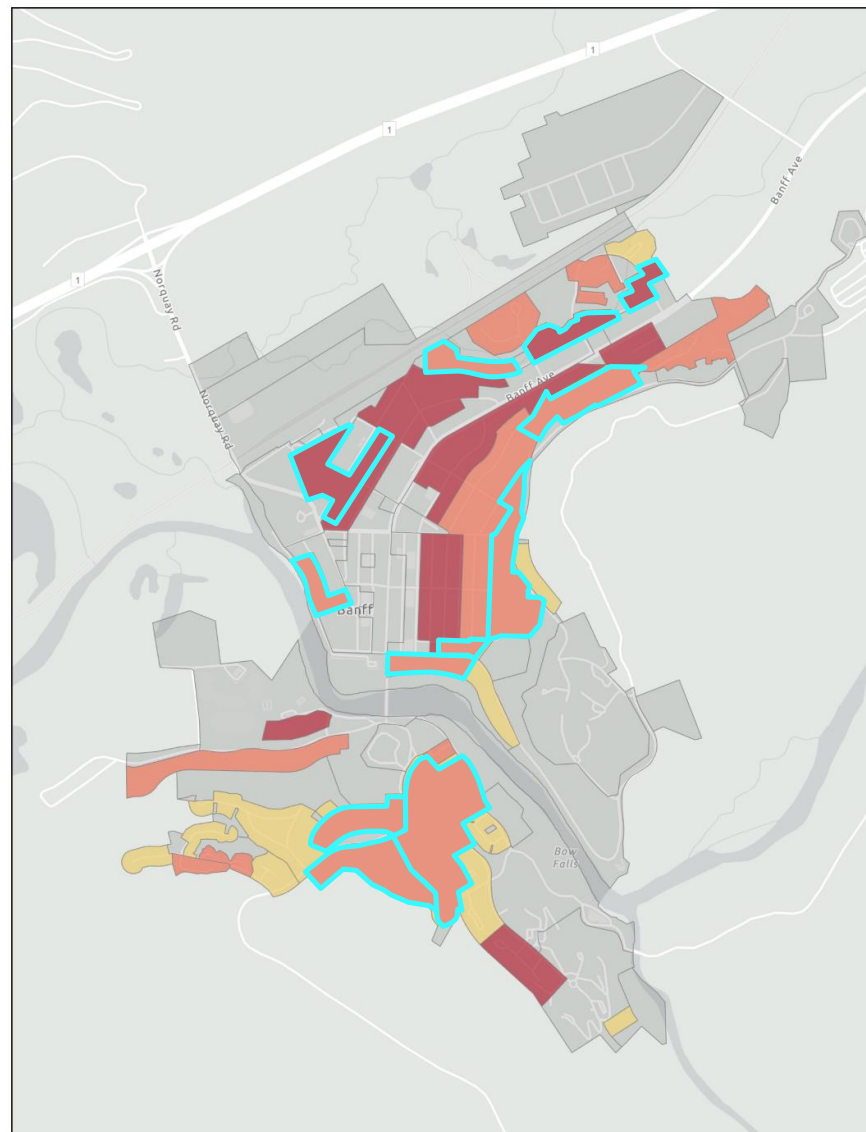
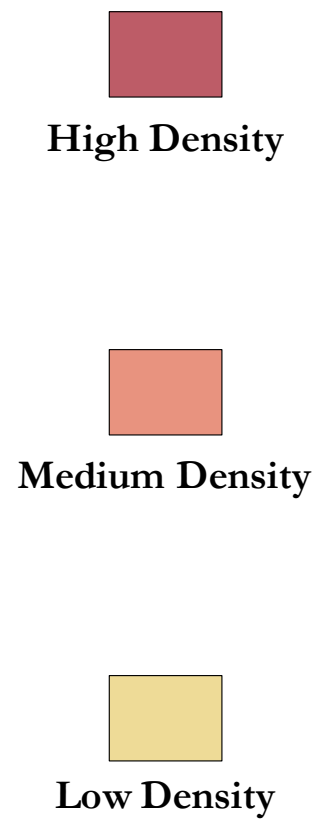
- Does the subject area have strong transportation connectivity for all modes that allows residents access to services, jobs, etc.;
- Is the subject area already similar in nature to another district which is already in a higher density grouping; and,
- Are there existing non-conforming buildings that could not be redeveloped.











3. Options for Amending the Boundaries of Existing Residential Land Use Districts

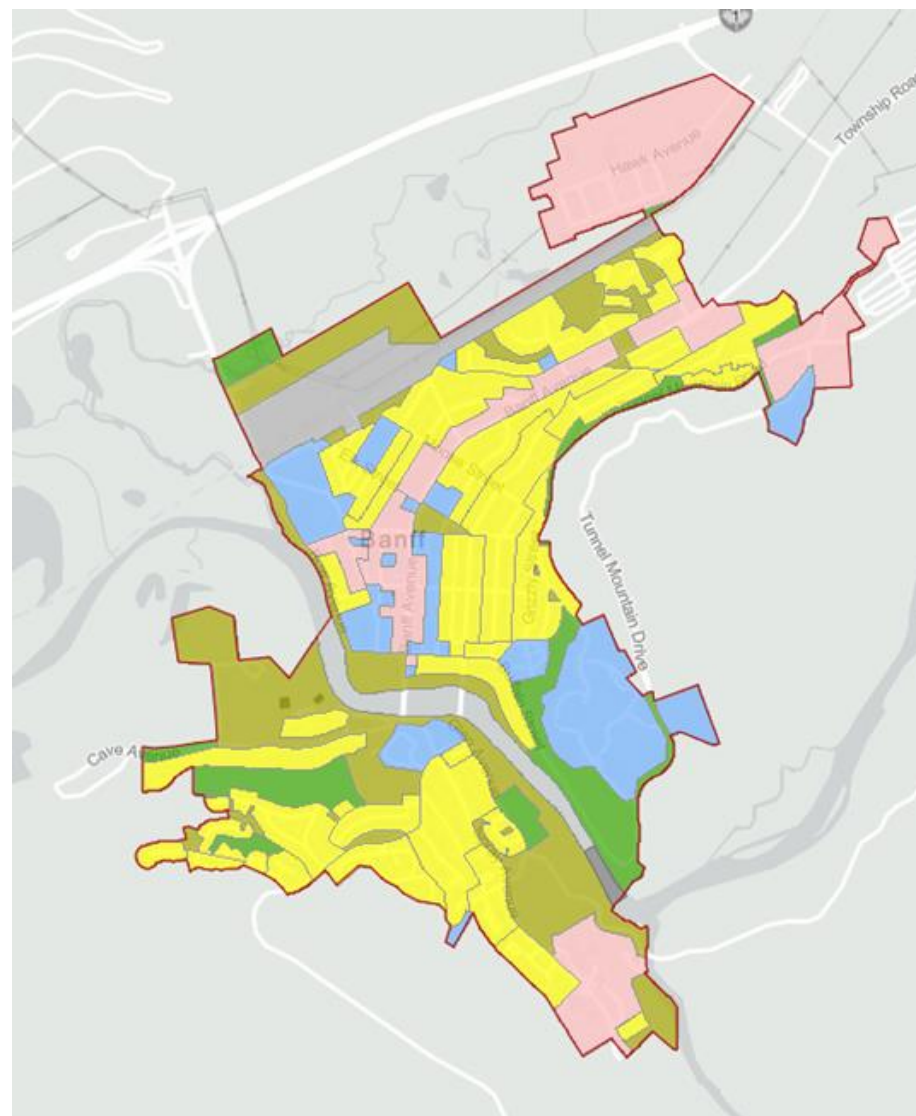
- i. Direct administration to draft amendments to the Land Use Districts boundaries and their associated regulations for the RCN: Cougar North, RMR: Marmot/Rundle, RRA: Rainbow Avenue, RRF: River Front, RSA: Spray Avenue, RSC: Squirrel/Cougar, RTM: Tunnel Mountain and RVV: Valley View districts as outlined in this section of the report;
- ii. Provide direction to administration on alternate density grouping and/or district boundaries for any Land Use District(s); or,
- iii. Make no changes to the existing Land Use District boundaries and use the density grouping outlined in section 1 of this report.

4. Rezone non-residential districts to residential districts

Town of Banff**3.94 km²****Residential Districts**1.36 km² – 35%**Parkland & Environmental Protection**1.04 km² – 26%

Parkland 18%

Environmental Protection 8%

**Commercial Districts**0.94 km² – 24%**Public Service & Banff Centre**0.48 km² – 12%

Potential Areas to Rezone Residential

Site 1 – Marmot Crescent Parkland

Site 2 – Hospital Lands/Parcel FE

Site 3 – Park Avenue

Site 4 – Porcupine/Marmot Crescent

Site 5 – 600 Block Remnant – Cougar St

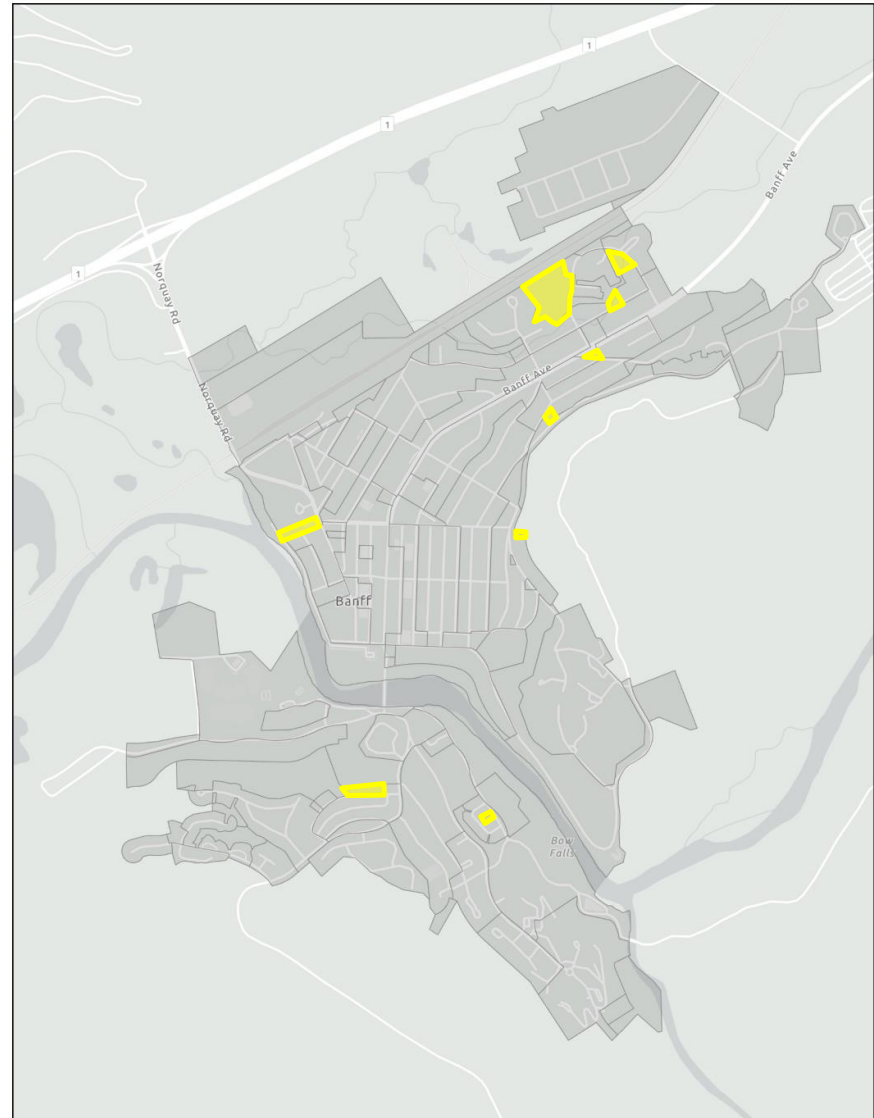
Site 6 – Deer Steet Bench

Site 7 – Banff Avenue & Antelope Lane

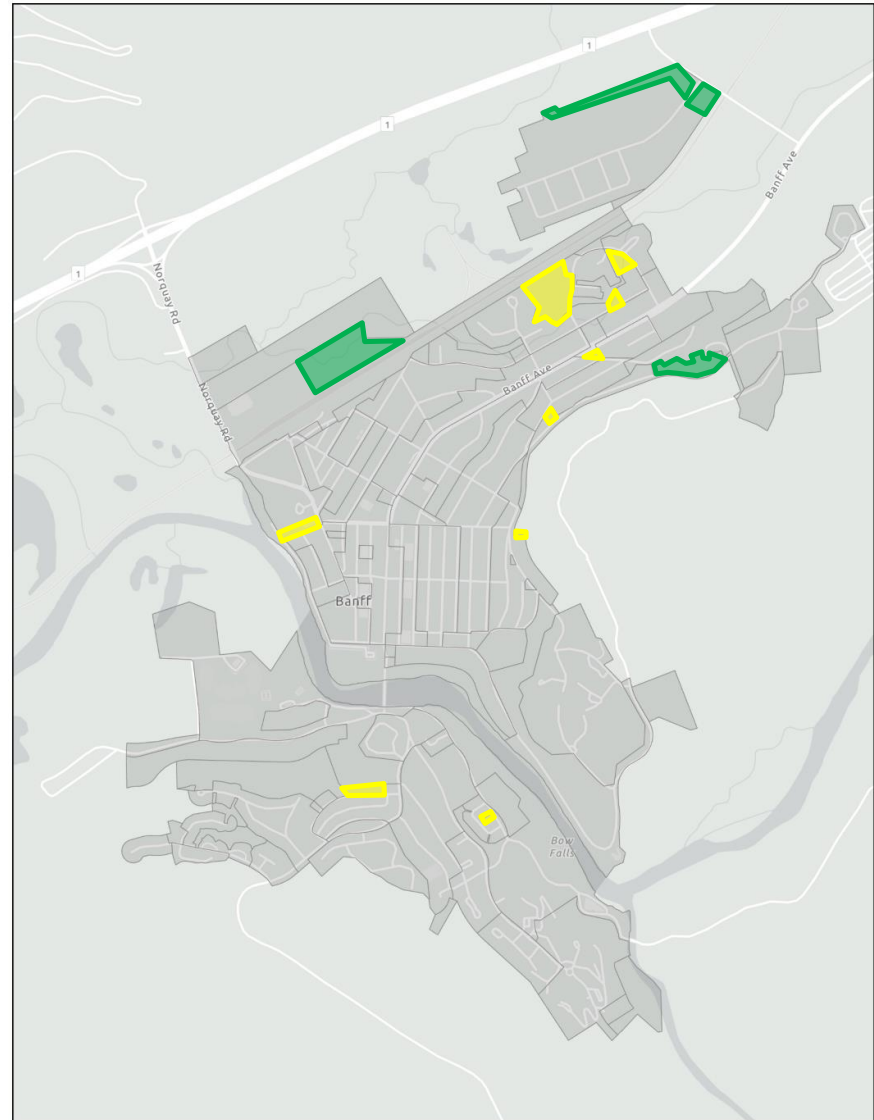
Site 8 – St. Julien Lot

Site 9 – Glen Crescent

Total: +/- 42,500 m² – 0.04 km² - 1.11%



The community reflects its national park setting and blends with the surrounding landscape by ensuring the net amount of land designated as Public Parkland (PP) and Environmental Protection (PE) does not decrease from that existing as of December 31, 2021, and by not allowing further commercial development in these areas.



4. Options to Rezone non-residential districts to residential districts

- i. Provide direction to administration on which non-residential districts should be considered for rezoning to residential districts and direct administration to return with a report outlining next steps; or,
- ii. Make no changes to non-residential zoned land at this time.

Response Options

1. Development Regulations

a. Simplify

Direct administration to draft Land Use Bylaw amendments that standardize and simplify development regulations to create high, medium and low density scenarios which includes:

- i. An amendment to the Land Use District map to include three residential zones; or,
- ii. Applying the same regulations for each density scenario to the existing Land Use Districts

b. Maintain Existing Land Use District Structure and Amend Within

- i. Direct administration to return to the Governance and Finance Committee with analysis of how density can be increased within the existing area descriptions and purposes of the 24 residential districts in the Land Use Bylaw; or,
- ii. Direct administration to return to the Governance and Finance Committee with options for Land Use Bylaw amendments that employ a broader approach, and propose development regulation changes based on Administration's interpretation of similar residential districts.

2. Development Regulations – Additional Options

- i. Direct administration to include the removal of minimum and maximum dwelling size with any Land Use Bylaw amendments;
- ii. Direct administration to include amendments to the development regulations to remove Single Detached Housing as an allowable use; or,
- iii. Direct administration to include amendments to the development regulations to introduce a maximum dwelling unit size for all housing types.

3. Amending the Boundaries of Existing Residential Land Use Districts

- i. Direct administration to draft amendments to the Land Use Districts boundaries and their associated regulations for the RCN: Cougar North, RMR: Marmot/Rundle, RRA: Rainbow Avenue, RRF: River Front, RSA: Spray Avenue, RSC: Squirrel/Cougar, RTM: Tunnel Mountain and RVV: Valley View districts as outlined in this report;
- ii. Provide direction to administration on alternate density grouping and/or district boundaries for any Land Use District(s); or,
- iii. Make no changes to the existing Land Use District boundaries and use the density grouping outlined in section 1 of this report.

4. Rezone non-residential districts to residential districts

- i. Provide direction to administration on which non-residential districts should be considered for rezoning to residential districts and direct administration to return with a report outlining which other land could be rezoned to comply with the Banff National Park Management Plan; or,
- ii. Make no changes to non-residential zoned land at this time.