

To Regina City Council:

I am submitting this letter on behalf of myself and many other residents across Regina who have expressed opposition to the proposed McDonald's at Evraz Place ("1700 Elphinstone Street - Discretionary Use - PL201900075"). We believe City Council should reject this proposal, or refer it back to administration for modification, for the following reasons:

Firstly, the proposal, the design and proposed commercial signage are inconsistent with the letter and spirit of *Design Regina - The Official Community Plan* ("The OCP"). Secondly, the consultation and the administration's response were inadequate -- due in part to the nature of Evraz Place, and the overwhelming opposition to the proposal in the official consultation and in the time since this proposal was covered by news media. And finally, the project undermines the long-term vision and objectives that were identified by REAL's own strategic plan that was presented to Council earlier this year.

The Proposal

Contrary to what is stated in the report (RPC20-23) included in the agenda packet of the July 8th, 2020 meeting of the Regina Planning Commission, the proposed development is, I believe, inconsistent with OCP goals. Three of these goals are listed to support the project : intensification; supporting historic places, cultural centres and civic resources and events; and finally "increase access to healthy, diverse and affordable food within neighbourhoods [...]" (emphasis added).

It defies belief that this proposed McDonald's would fulfil the "healthy, diverse and affordable food" goal of the OCP, especially when that goal is reproduced in full:

13.10 Collaborate and seek partnerships to increase access to healthy, diverse and affordable food within neighbourhoods through Policy 3.2.3 and the following:

13.10.1 Building capacity in the food sector;

13.10.2 Supporting local-food and food-related business; and

13.10.3 Promoting community gardens and year round space for farmers markets within the city.

This OCP goal is clearly about addressing "food deserts", i.e. lack of access to affordable groceries and similar matters, but the report waters down this goal to meaninglessness -- if we

can claim a McDonald's is healthy to meet this goal, what could possibly be considered unhealthy? It is also located less than 500 metres from a Burger King, so this proposal is not especially diverse. The surrounding North Central neighbourhood has a relative shortage of affordable grocery stores. With apologies to the author(s) of the report, McDonald's is not an affordable substitute for healthy groceries, so this *OCP* goal should not even have been mentioned.

The McDonald's proposal is also justified in the report under the intensification heading. Although the *OCP* does not specifically list the grounds of Evraz Place as an intensification area in the "Map 1 - Growth Plan" (p. 77), the *OCP* lists several priorities for intensification lands, as well as other related goals found elsewhere in the *OCP* that fall broadly into similar themes: relating to integration, connectivity with and sensitivity to surrounding contexts and neighbourhoods (Goals 7.1.2, 7.1.7, 7.1.10, 7.2, 7.36.2, 9.2, 12.6.4, 13.4, 13.6, 14.29.4), ensuring quality architecture that adds to rather than detracts from the neighbourhood (Goal 6, 7.1.6, 7.1.8, 7.1.9, 7.18, 7.34, 7.35, 7.36.2, 7.40, 10.9), appropriate density (7.5, 7.12, 7.13, 7.36.2), transit (7.13, 7.18, 13.20.2, 13.23, 14.29.3), walkability/accessibility/active transportation (7.39.3, 13.20.2, 14.29.3), or meeting the daily needs of residents (7.1.4). These goals do not seem to have been taken into account here. It's also worth noting that "redevelopment should consider the impact on traffic volumes and minimize increases in traffic on the adjacent streets" (p 102) although the administration report states it will have the opposite effect.

The report claims that the proposed development "will be interconnected from a walkability perspective" but then in the same paragraph highlights the "significant spatial separation" from residences. By my measurements using Google Maps, the proposed McDonalds is 100 metres from the houses across Lewvan Dr, but also over 150m away from the Agribition Building to the West, across a vast parking lot. The report again stretches the goals of the *OCP* far past their conceptual limits. The plans at Appendix A-3.1 show a building hugging the Lewvan and 11th Ave driveway intersection, although offering no connections whatsoever to the pedestrian crossing at the intersection below. The plan notes "Ex. fence line to remain" facing Lewvan Dr. Neither of these features promote walkability or access to the only nearby transit stop, which is across Lewvan to the west in the nearby neighbourhood.

"Applying the signage regulations associated with MLM - Mixed Large Market Zone will accommodate sign associated with proposed development and accommodate future signage requirements."

These proposed changes ominously open the door to a jumble of competing commercial signage along Lewvan Drive in the style of North Albert Street-style or Victoria Ave East, rather than maintaining the currently relatively subdued facade of Evraz Place as it currently exists, and cannot be said to be a desirable outcome. I would refer Councillors to the now-famous photo of Breezewood, Pennsylvania which can be obtained via a simple Google search. How can this be in keeping with the goals of the *OCP*?

This proposed development is clearly an automobile-focused, low-density fast food development, not a healthy and sustainable addition to the neighbourhood or to the City of Regina. It does not encourage walking or transit use and does not provide healthy, diverse and affordable food. It flies in the face of the goals of the *OCP*.

Consultation

I will touch briefly on the consultation process. After public notice, pursuant to the *Planning and Development Act, 2007*, SS 2007, c. P-13.2, s. 55, comments received were opposed 5-3, with only one comment in complete, unqualified support for the proposal. After Planning Commission approval, the proposal was covered by news media and received further attention on social media. Comments on social media that I witnessed were almost unanimously a combination of shock, dismay, and disgust.

Although the public notice comments expressed legitimate concerns, falling under the *OCP* goals, the response was, I believe, unnecessarily dismissive. The stated priorities and goals of the *OCP* stand in stark contrast to this process. For example, “Community input will drive a proactive approach to city planning” (p. 6), or “City departments [...] and the community must work together on social development and inclusion strategies. This approach calls for a sharing of resources as well as collaboration and consultation” (*OCP* section D11, p. 57), and for the city to “Provide opportunities for residents to be engaged in civic life” (13.18). This is in addition to numerous *OCP* goals that emphasize collaboration and consultation (12.6, 13.4, 13.14) and of course 13.10 cited above which also emphasizes a collaborative process.

The intensity and relative unanimity of comments that I have witnessed belie the claims made by some of a lack of interest in city planning. Perhaps the lack of participation in the statutory

public notice process demonstrates cynicism with outcomes of a Planning Commission and a Council that they feel do not listen to or incorporate residents' concerns.

The city-wide significance of Evraz Place and the strong reaction invoked by residents across the city suggest that a broader consultation on the future of the site is required. I believe that Regina residents across the city who use and cherish this civic infrastructure should be proactively consulted and included in the changes to, and the future vision of the site.

The REAL Vision

On the topic of the vision for the site, the *REAL 2020 to 2035 Strategic Plan*, as included in the February 19, 2020 Priorities and Planning Committee meeting agenda packet (item PPC20-3), noting the financial challenges facing REAL and Evraz Place, mentions plans to develop the site along a "District Model" to increase opportunities in the surrounding neighbourhoods, and provides photos of several exciting examples from across North America. At page 32, under "Pillar 3: Commercial development", the report lists "Improved site experience" as a goal, and at p. 35-6 the following ideas to obtain this experience: "mixed use residential opportunities", "food and beverage experiences beyond concessions", "grocery store", "public gardens, bee keeping and community agriculture". It also mentions an "Opportunity to create Alternative Transit Opportunities and Connections" (p.44).

In a July 9, 2020 CBC News story on this proposed development, CEO Tim Reid states "We want to provide sustainability, opportunity, and maximize the experience and memory-making that happens at Evraz Place." The discussion paper in the Priorities and Planning Committee agenda packet report notes that "REAL's mandate as set out in the UMA is, among other things, to: Operate in the best interests of the community and enrich the quality of life for people in the community through the hosting and delivery of local, regional, national and international events." And finally, the *OCP* itself mentions "leveraging special economic assets [...] with high linkage/spinoff potential."

The proposed development seems to fulfil none of these goals, and instead will anchor for the coming years uses that I believe will detract from the vision expressed by REAL's Futures Committee to increase the attractiveness, accessibility and dynamism of Evraz Place.

For the reasons mentioned above, I would humbly suggest that City Council reject the proposal or at the very least refer the application back to administration for further improvements and consultation with Regina residents.

Christopher Strain