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**April 8, 2022**

Urban Planning Committee  
City of Edmonton  
1 Sir Winston Churchill Square  
Edmonton, AB T5J 4R7

**Re: April 12, 2022, Urban Planning Committee - Item 6.2 -  
Zoning Bylaw Renewal Report #4 - Proposed Zones, Initiative Update and Next  
Steps and Item 6.3 - District Planning Authorization and Engagement Approach**

Dear Urban Planning Committee and Members of Edmonton City Council,

As the collective voice of over 160 land development companies, planners, surveyors, landscape architects, engineers, contractors, finance managers, and more – we have and continue to provide expertise, insight, and support to Council and Administration on policy and regulatory efforts like District Planning and the Zoning Bylaw Renewal Initiative. Our members contribute to economic growth through millions of investment, job creation, and improvements to the built environment – and are committed to the success of these important catalyst priorities for the city.

*Zoning Bylaw Renewal Report #4 – Proposed Zones, Initiative Update and Next Steps*

As your city building partners, we expect that the Zoning Bylaw Renewal Initiative will provide increased development opportunities that are flexible yet deliver predictable outcomes to enable more development opportunity and creativity than exists today as Edmonton grows from 1 to 2 million people. The objective should be to reduce red tape, create new economic growth opportunities, and attract investment to build livable and attainable communities. In our view, the drafts provided to date – which UDI members have provided comments on – do not reflect an increase in flexibility in some important areas. For example, the new low density residential zone (RS1) establishes less development opportunities than what is currently allowed under the RMD and RLD zones that were approved by Council many years ago. Furthermore, the new bylaw does not address any Direct Control zones or give consideration for innovation in housing types and evolution of the market over time.

In our view, the proposal to rezone the entire city to the closest equivalent zone under the new Zoning Bylaw misses a critical opportunity to implement the City Plan proactively and strategically and will result in potentially tens of thousands of lots needing to be rezoned individually at Public Hearing over time to allow for the changes identified in the land use concept, which is anticipated to be further articulated through District Plans. This is inefficient from a process perspective and will prolong community change needed to activate Edmonton's growth strategy. Our recommendation is to ensure that new zones are implemented in accordance with the City Plan, which is currently noted as out of scope for the project. A process to align implementation of the new Zoning Bylaw with Districts Plans is recommended as a next step.

#### *District Planning Authorization and Engagement Approach*

With regards to the District Plans (and the District General Policy), our expectations for this important policy initiative are that opportunities for increased development are clearly identified in alignment with the City Plan to enable private sector growth and to provide clarity on areas where the public sector will invest in infrastructure and community amenities required to support anticipated population and employment growth. These two elements do not appear to be clearly articulated yet, and we hope to see these outcomes realized as they will bring the City Plan to life. We look forward to contributing to ongoing conversations about how the District Plans can be leveraged to provide better investment certainty for the public and private sectors alike, and how they can open more development opportunities city-wide.

#### *1-Year Delay for Projects*

The Zoning Bylaw Renewal Initiative set its course in early 2018, with a prioritization of resources and time – yet has not met the mark in terms of its original goals and outcomes. Concurrently, the land development industry has and continues to provide volunteer time and expertise at Administrative-led workshops and meetings. With many items of work positioned as “post-renewal,” it is unclear whether this work will be carried out effectively without a clear timeline for their implementation. Lacking this information, it is unclear for the development industry how city builders should best prepare and plan for change – and how best to steward their investments across Edmonton in the meantime.

We would like to underscore a sense of urgency to move forward with these projects as important priorities for Administration. While the two initiatives have been delayed to ostensibly increase stakeholder engagement, the actual window for engagement identified (3 months from September to November, 2022) remains the same as previously proposed (January to March 2022, 2022) – it has just been moved back in

time. Until the new bylaw is in place, the existing zones and Direct Control zones will continue to be used to enable development, which does present a risk in terms of change management. It is unclear for the land development industry how developments in-queue will be processed, and whether they should wait for the new bylaw to come into-effect or not. We are committed to continuing to participate in engagement opportunities to mitigate uncertainty and advance this work in a timely manner.

### *Moving Forward*

We believe there could be better alignment between the two projects (Zoning Bylaw Renewal Initiative and District Planning) based on the fact that aligning new zones with growth opportunities identified in the District Plans is considered out of scope.

Our recommendation is to **clarify and couple the desired outcomes of both initiatives, so they are driving change together more strongly**. We believe these projects could be refocused to create more development certainty and predictability that enables alignment with the City Plan in a manner that creates more clarity for private development opportunities and highlights public investment priorities required to support population growth in all areas of the city. How these projects will enable development, reduce timelines, and support city building should be presented with clearly defined measures and metrics. Another recommendation is for Administration to **clearly outline how out-of-scope items will be implemented and their timelines** – so Edmontonians are clear on when they will be made a priority or come into effect. At a time when the country is pursuing speed to market for housing, our call to action in Edmonton is to expedite processes and ensure predictable outcomes.

Attracting another 1 million more Edmontonians and creating 520,000 more jobs will require partnership between the public, private and community sectors and our membership is committed to contributing to this partnership and city change. Thank you for the opportunity to provide feedback regarding these crucial files.

Sincerely,



Kalen Anderson  
Executive Director, UDI-EM

Copy: Michaela Davis, Chair of UDI Planning Committee  
Office of the City Clerk  
Stephanie McCabe, Deputy City Manager of Urban Planning and Economy