



**Urban Development
Institute**
Edmonton Metro

#324 Birks Building
10113 – 104 Street
Edmonton, AB T5J 1A1

info@udiedmonton.com
udiedmonton.com
780.428.6146

December 1, 2023

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

**Re: December 5, 2023, Urban Planning Committee – Item 7.1
District Planning - 1.25 Million and 2 Million Population Milestones**

Dear Urban Planning Committee and Members of Edmonton City Council,

The Urban Development Institute – Edmonton Metro (UDI-EM) is a non-profit organization that represents more than 180 companies in the real estate development industry. Collectively, our members contribute hundreds of millions of dollars in assets to the City of Edmonton through residential, commercial, and industrial development, and steward meaningful improvements to the built environment and the communities Edmontonians experience each day.

Over the past few years, we have actively supported Council and Administration in advancing key planning and development initiatives that help to implement The City Plan, such as the recently approved Zoning Bylaw. Our members provide hundreds of hours of volunteer time and share city-building expertise and perspectives to refine municipal policies and programs in a manner that ensures they perform well and can meet Edmonton's growth goals. The next important initiative to enable more community investment is District Planning, which we believe should provide clarity on areas where and when the public sector will invest in the infrastructure and community amenities required to support ongoing population and employment attraction.

Engagement and process

We would like to commend Administration for their ongoing and thorough engagement with industry, other stakeholder groups and members of the public and for listening and making key changes that have been incorporated in the most recent iterations of the District Policy and District Plans. These adjustments demonstrate a willingness to ensure that this transformative planning project can meet its intended goals and objectives.

Much of the City Plan implementation work that is most important to the success of industry is being delayed as the District Planning process is held back. This project has already experienced a one-year delay in 2022 and another 9-month delay in 2023. Both delays occurred because of requests for additional time for public engagement. We strongly recommend that this project move forward without any further delay and that important systems and network planning that will fundamentally enable development in all areas of the city proceed apace.

Requested refinements prior to Public Hearing

While clear progress has been made over the course of the initiative, it is the opinion of industry that there are still outstanding items that must be addressed. Our desired outcome is for District Plans to operate as an economic blueprint – one that helps to enable development opportunities city-wide and clearly articulates areas for public sector investment to support growth. Work to improve the plans prior to Public Hearing early next year is recommended.

High level planning in alignment with the City Plan is a useful first step for the District Plans, but it is ultimately their implementation through more detailed planning and engineering design that will really move the needle when it comes to spurring new development along nodes and corridors city-wide and enabling critical residential and non-residential development opportunities. Rather than addressing each of the 15 District Plans separately, our feedback is organized thematically based on the City Plan typology of Redeveloping, Developing, and Future Growth Areas (attachment 1).

Redeveloping Areas: Infrastructure Investment Strategy

The stated goal for District Plans has been to guide growth to The City Plan's first population target of 1.25 million. To realize this, the District Planning initiative should remain focused on leveraging and supporting private-sector investment – from housing that will welcome new residents to commercial and industrial developments that will attract new businesses and economic investment. To successfully achieve the goals of the District Plans and modernize the city planning system, a clear investment strategy focused on infrastructure upgrades is required. It is industry's opinion that there should be collaboration between the City and EPCOR on what the outlook is for infrastructure upgrades throughout the redeveloping areas. It is not financially feasible to push these costs onto private industry on a site-by-site basis, which has been the practice to date.

As city-builders, we cannot stress enough that growth in the nodes and corridors, in particular, will not flourish without the significant front-ending of infrastructure upgrades by the City. Of note, it is important to remember that there is a clear payback on up-front infrastructure investments via the resulting uplift to the tax base and a significant policy win in terms of seeing the vision of the City Plan through to its redevelopment reality, including building upon existing major investments by all orders of government such as the LRT network. Significant public investment requirements were contemplated as part of the preparation of The City Plan itself and are a cost that was included in high-level analysis of the land use plan (attachment 2).

Finally, not all areas that are currently experiencing or preparing for redevelopment are properly indicated in the District Plans and we recommend a thorough review prior to finalization of the drafts. For example, The University of Alberta Properties Trust has completed a master plan for the West240 lands on a portion of the existing University of Alberta south campus and is currently preparing a detailed redevelopment and subdivision plan. The master plan encompasses the entire 231-acre site and envisions accommodating between 4,000-5,000 new residents. However, the Scona District Plan refers to these lands at 1.25 million as, variously, institutional, and open space, and the "Vision at 2 million" for the Scona District Plan does not indicate any urban development on these lands at all.

Developing Areas: Clarity on Administrative Amendments

Recent increases in administration-driven plan amendments have led to additional red tape, uncertainty, and increased costs for homeowners and businesses. Currently, there is a lack of clarity on how the District Plans will impact this situation either positively or negatively. To rectify this confusion and to ensure a streamlined development process, industry recommends that clear rationale/intention be explained by administration when amendments are deemed necessary through the District Planning initiative.

It will not be helpful if District Plans add additional layers of complexity to the amendment process. We are encouraged by recent and planned repeals of outdated Area Redevelopment Plans and older Outline Plans and Neighbourhood Structure Plans. Preparing an Administrative Directive to clarify how various statutory plans will be upheld, amended, or appealed, over time, would be a helpful first step to implementing the District Plans.

Future Growth Areas: Planning Preparation

As currently written, District Plans that reference Future Growth Areas currently lack any recommended land use direction or planning analysis, which is a major missed opportunity. For example, the Rabbit Hill District Plan and Ellerslie District Plan include land that was annexed by the City of Edmonton from Leduc County in 2019 out of a sense of urgency to plan for high and imminent growth in the area. As illustrated throughout multiple maps in both District Plans, the Future Growth Areas are currently bereft of information that would be vital to the planning process. Map 6: Land Use Concept to 1.25 Million on page 25 of the Rabbit Hill District Plan identifies the land as largely agricultural. Further, the “Vision at 2 million” illustration does not reflect the development expectations outlined in The City Plan (attachment 3).

These District Plans currently indicate, in writing and mapping, that there will not even be a consideration for the planning of these lands when Edmonton reaches a population of 1.25 million. When reviewing these plans, one would have to question why the City annexed this land from Leduc County in the first place if there is no place intention to begin the planning process, even in general terms. The City’s annexation process started over a decade ago

based on a demonstrated need for more room to grow in the south and not executing on this mandate will present a clear detriment to the growth and success of Edmonton.

A plan that indicates that no planning is contemplated or permitted sends a strong signal that the City is not interested in attracting economic development in these areas. Further, it will push non-residential and residential development to the surrounding regional municipalities thereby eroding the tax base while increasing costs and encouraging leap-frog development.

Now is the time to get moving on planning these areas. Demand for both residential and non-residential development is high and growing in the Edmonton metro region, and it would serve the major urban centre of the region to participate actively in that opportunity. Significant front-end work in terms of infrastructure systems and networks, as well as market demand and detailed land use studies, are required today so Edmonton does not miss the mark when housing and industrial development demand is needed tomorrow.

Moving forward

We recommend that Administration make the following changes to the District Plans prior to advancing the final draft for City Council decision at Public Hearing in the spring of 2024:

1. **Redeveloping Areas:** Clarify the growth management approach to redevelopment by indicating the system and network planning that is required to bring infill-at-scale to life in alignment with the City Plan, particularly in priority growth areas at nodes and along corridors.
2. **Developing Areas:** Clarify how District Plans will be administered in developing neighbourhoods that have existing and operational NSPs and ASPs in place in a manner that reduces planning timelines and red tape.
3. **Future Growth Areas:** Amend the Rabbit Hill and Ellerslie District Plans to outline the key systems and network planning that is required to pre-plan these areas and change the maps to reflect planning work that is required over this timeframe.

In conclusion, we request that Administration focus on policy fine-tuning over the coming months prior to Public Hearing next spring to leverage the first edition of the District Plans to their fullest potential. There is a sense of urgency to move forward with the important system and network planning and analysis that will lay the foundation for public and private sector investment city-wide. This work requires the approved District Plans to be in place.

Thank you for the opportunity to provide feedback on this important planning initiative for the City of Edmonton. The City has made significant strides to cultivate a business-friendly environment; one that catalyzes developments that provide both an economic and social benefit. We should not take our hands off the wheel – as we are seen as the national leader in regulatory and policy reforms that support and attract economic investment. We look forward to continuing to work with administration to ensure that the District Policy and District Plans are constructed effectively and contribute significantly toward achieving the goals of The City Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kalen Anderson', with a long horizontal flourish extending to the right.

Kalen Anderson, RPP/MCIP
Chief Executive Officer, UDI-EM

Attachment 1: City Plan Map 9 – Development Pattern Areas

Attachment 2: City Plan Map 1 – The City Plan Concept

Attachment 3: Rabbit Hill District Plan – Vision at 2 Million

Copy: Office of the City Clerk

Andre Corbould, City Manager

Kim Petrin, A/ Deputy City Manager of Urban Planning and Economy

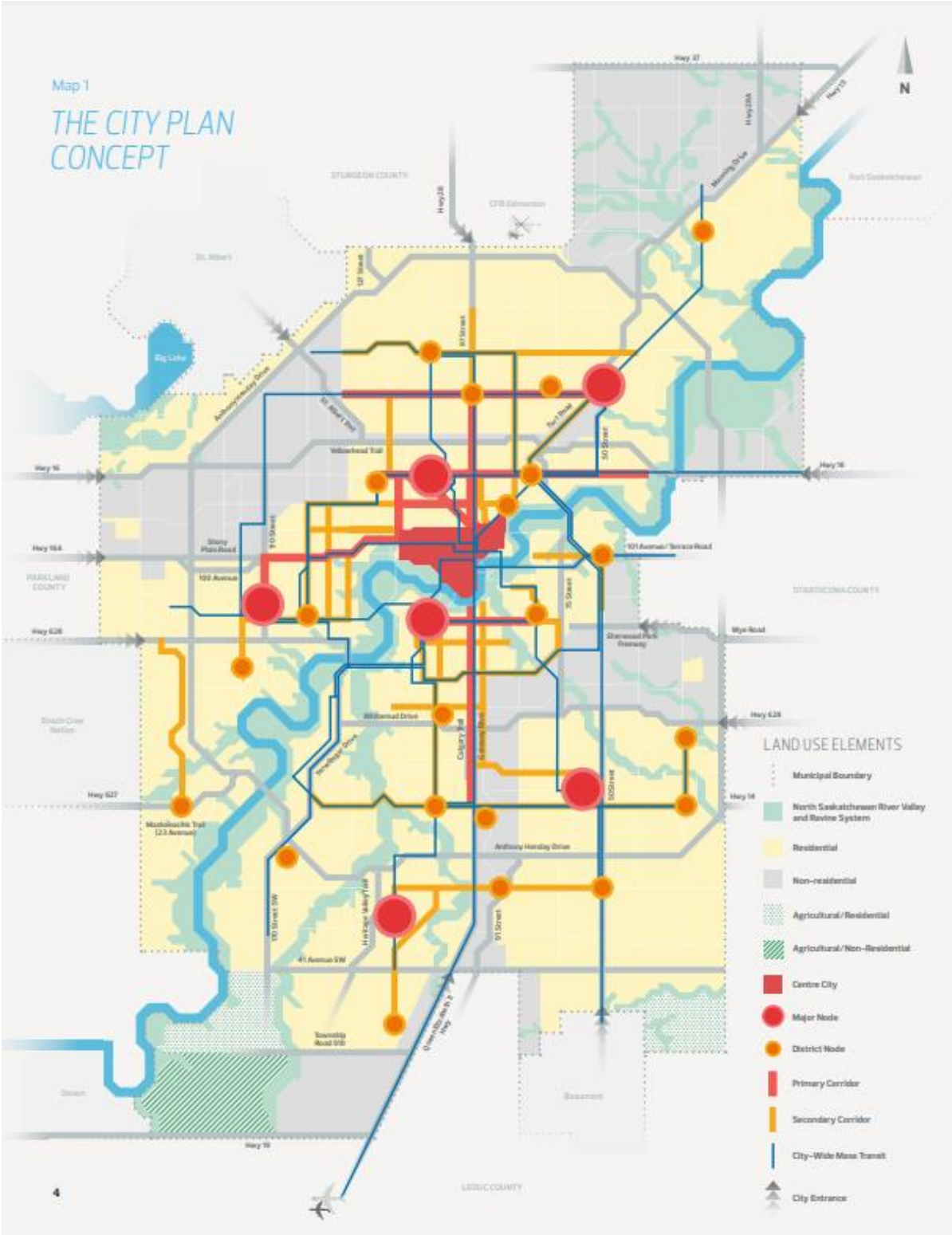
Kent Snyder, Branch Manager of Planning and Environment Services,

Urban Planning and Economy

Jenn Brown, Chair, UDI-EM Nodes & Corridors Committee

Michaela Davis, Chair, UDI-EM Developing & Redeveloping
Committee

Attachment 2: City Plan Map 1 – The City Plan Concept



Attachment 3: Rabbit Hill District Plan – Vision at 2 Million

Map 12: Vision at 2 Million

