



May 23, 2024

Edmonton City Council
City of Edmonton
1 Sir Winston Churchill Square
Edmonton, AB T5J 4R7

Re: Letter of Support for District Policy, Repeal of Council Policies and Guidelines, and District Plans

Dear Mayor and Council,

BILD Edmonton Metro is a non-profit organization that represents more than 500+ companies in the real estate development industry. Our members include real estate development companies, home builders, contractors, renovators, planners, surveyors, landscape architects, engineers, lawyers, marketers, brokers, finance managers, and more.

Our industry contributes billions of dollars to the City of Edmonton through residential, commercial, and industrial development, and stewards meaningful improvements to the built environment and the communities that Edmontonians experience each day.

Over the past few years, we have actively supported Council and Administration in advancing transformational planning and development initiatives – from The City Plan to the Zoning Bylaw. Working with the City of Edmonton, we have helped to foster a healthy housing market, a great quality of life, and earned a reputation as a national leader in addressing affordability and supply issues. As your city building partners, we remain committed to building sustainable communities and shaping diverse built environments to welcome an additional one million more to the City of Edmonton.

As an industry, we have been clear and consistent in our feedback that the District Plans should 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. We appreciate the much-needed administrative clean-up associated with this work, which will include the proposed and ongoing repeal of plans that are no longer required and the streamlining of a new planning framework for Edmonton that aligns policy with The City Plan in a purposeful manner. The process changes that the District Plans introduce are not

the flashiest element of the project but may well be the most important from an ongoing policy management and planning process stewardship perspective – ensuring good governance is the goal.

At the highest level, our input to Administration over the course of this process has been to:

- **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.
- **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 and does not jeopardize existing investments.
- **Future Growth Areas:** Outline the key systems and network planning required to pre-plan these areas promptly to enable statutory planning work and, ultimately, the future development that is required for growth.
- **Implementation roll-out:** Clarify when the plans will be updated by Administration on a predictable schedule, either based on a set timeframe or population horizon, and define when the next major update to plan for a population of 1.5 million will commence.

While the District Plans contain some detail around intensification in Redeveloping Areas, we encourage Administration, as part of their ongoing implementation, to develop a clear investment strategy to support economic development and population growth, inclusive of an analysis and sequencing of infrastructure upgrades by the City. A clear understanding of where public sector investments will be made, and when, can send a signal to the private sector about where growth can be accommodated.

In their proposed form, District Plans that encompass Future Growth Areas (Rabbit Hill and Ellerslie), do not provide any land use detail or even a basic development vision. In fact, they fail to outline how these areas can support further growth, residential development, and economic investment. As land use plans, they also fail to outline any relevant planning direction that accords with The City Plan. This issue should be addressed and prioritized through subsequent work of Administration and utility providers as soon as possible.

Specific Requested District Plan Changes

It is critical to ensure that District Plans are interpreted consistently in developing areas relative to approved ASPs and NSPs. The existing gap needs to be resolved. To clarify expectations, we would like to see the following wording added to the material and suggest the motion below:

That the District Policy (Section 1.2, Authority and Relationship to Other Plans) and Section 1.4 “Amendments” in all fifteen District Plans be amended to provide guidance on the applicability of District Plans on existing local plans that are being advanced by the development industry and community at-large:

- *District Plan policies are not intended to prescribe changes and/or to override existing land uses, policies, or standards at the detail of an Area Structure Plan (ASP), Neighbourhood Structure Plan (NSP), or Neighbourhood Area Structure Plan (NASP).*
- *Amendments to an ASP, NSP, or NASP shall not trigger an amendment to a District Plan if a concurrent amendment to The City Plan is not required.*

Required Implementation Steps

To move the fifteen District Plans from concept to implementation in a predictable manner, the following actions need to be taken:

- Develop an infrastructure sequencing strategy to activate the intensification around Nodes and Corridors, in alignment with the District Plans.
- Create a logical and predictable system for how District Plans will be monitored, evaluated, and amended over time. This could include monitoring of inputs like population growth, infrastructure investment changes, and other indicators, and as these shift, could necessitate an amendment process to be carried out by Administration (e.g., annual omnibus to address performance and unintended consequences of the District Plans). Being clear on this will set shared expectations with the community-at-large and development industry, as opposed addressing to ad-hoc changes.

After more than 3 years of engagement, we would like to congratulate City Council for making it to this point and thank Administration for their ongoing efforts to advance the work. It is our expert opinion that Charter Bylaws related to District Policy, Repeal of Council Policies and Guidelines, and District Plans, should be approved without further delay.



Any additional delay via referral could result in negative impacts to advancement of subsequent and interconnected work and is unlikely to provide material benefit to industry or community. Now is the time to move forward, with focus.

Sincerely,

A handwritten signature in black ink, appearing to read "Kalen Anderson", written in a cursive style.

Kalen Anderson, RPP, MCIP
Chief Executive Officer, BILD Edmonton Metro

Copy: Office of the City Clerk
Eddie Robar, i/ City Manager
Kim Petrin, Deputy City Manager, Urban Planning and Economy
Kent Snyder, Branch Manager, Planning and Environment Services
Travis Pawlyk, Branch Manager, Development Services
Elise Shillington, Chair, BILD Edmonton Metro Developing & Redeveloping
Committee
Jenn Brown, Chair, BILD Edmonton Metro Nodes & Corridors Committee
Mark Solikowski, Chair, BILD Edmonton Metro Commercial & Industrial Committee
Shane Gerein, Chair, BILD Edmonton Metro Planning Working Group
Lindsey Butterfield, Director of Government Relations and Policy, BILD Edmonton
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