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June 7, 2023

Andre Corbould, City Manager
City of Edmonton
1 Sir Winston Churchill Square
Edmonton, AB T5J 4R7

Re: Substantial Completion Policy - City Plan Growth Management

Dear Andre,

Thank-you for meeting with us on June 6th to discuss opportunities and challenges relative to implementation of the City Plan's growth management strategy, particularly with respect to Administration's current focus on preparing a procedure to deliver the substantial completion policy ([2.3.2.3](#)). At a high level, industry's priority is to ensure that any policy implementation strategies will not artificially constrain housing supply in Edmonton, thereby increasing costs and failing to meet consumer demand.

What we heard from you was a desire to better understand, rationalize, and plan for both capital and operating requirements associated with the build-out of the future growth areas. We share this interest and are deeply committed to finding innovative solutions to reduce the scope and scale of public infrastructure requirements that add costs for individual homebuyers and, ultimately, taxpayers. As your city building partners, this is a significant area of alignment and provides opportunity for ongoing collaboration on [public land use and engineering efficiency](#) (Urban Affairs, May 2023).

The city, metro region and province are all growing rapidly and as such, it is critical to plan for this growth. The most recent [Edmonton Metropolitan Region Board population forecasts](#) (June 8, 2023) estimate the population of Edmonton proper will reach between 1.3-1.7 million people by 2044, with a medium growth scenario of 1.5 million – this represents an approximate 50% increase over the next 20 years. To match this momentum, we recommend establishing an implementation framework for The City Plan to holistically consider how we will plan, service, and develop the lands south of 41st avenue that were annexed by the City of Edmonton to ensure adequate land supply needed for growth. The substantial completion policy is but one piece of a larger system of actions and priorities required to understand the capital investments that will be required by private investors and public agencies to

build communities for Edmontonians – the future growth area, as indicated in The City Plan, is critical to this successful outcome.

Our specific requests related to the substantial completion policy are as follows:

1. **Sound Methodology.** Any Administrative procedure created to implement City Plan policy 2.3.2.3 must be based on sound methodology and detailed understanding of the Edmonton region's housing market and sub-markets. Previous drafts have revealed significant issues in this regard.
2. **Cutting Red Tape.** Canada is currently experiencing a market housing affordability crisis which different jurisdictions are meeting with exceptional tools, such as CMHC's [Housing Accelerator Fund](#) and provincial legislation in Ontario ([Housing Supply Action Plan](#)) and BC ([Housing Supply Act](#)). We would like to know how Edmonton will lead through this change and how The City Plan's housing affordability target will be achieved to ensure speed-to-market and attainable housing supply.
3. **Preparing for Growth.** Industry would like to see a clear “roadmap to rooftops” for the lands south of 41st avenue that were annexed by the City from Leduc County in on January 1, 2019. We would like to understand the steps the City and industry will take to prepare these residential and non-residential lands for growth, so they are ready for development when the market demands it. This land was specifically annexed to ensure that Edmonton has [enough room to grow](#), and The City Plan's land development concept (Map 1) reflects this intention. Servicing studies and network planning need to start now to ensure that more detailed planning, design, and development can occur in a timely manner when warranted.
4. **Investing in Communities.** Industry pays for and builds most aspects of new communities and the City's investment has not been keeping pace. It is concerning that transit extension and parks development provided by the City, for example, continue to lag private investment and we would like to see efforts refocused on providing these core municipal services to enable complete communities.
5. **Engaging Industry Expertise.** There is a lack of expertise within City Administration about real estate development, market dynamics and land use economics. Industry can help fill this gap through continuous engagement and ongoing collaboration. We would like to be a part of the solution to achieving the City Plan and housing the next million

Canadians in this city. Edmonton's [Real Estate Advisory Committee](#) was cancelled in 2021 with no replacement forum put into place – we believe there is an opportunity to create a suitable and effective replacement and our membership would be happy to contribute.

We look forward to supporting Council and Administration in this crucial work. As an industry we are more focused on getting the process and methodology right to enable economic development and ongoing growth than rushing towards an outcome within the next 8 weeks at Urban Planning Committee that could set much needed high-level planning and engineering behind, unnecessarily.

Sincerely,
Kalen Anderson

A handwritten signature in black ink, appearing to read 'Kalen Anderson', with a stylized, flowing script.

Executive Director, UDI-EM

Susan Keating

A handwritten signature in black ink, appearing to read 'Susan Keating', with a stylized, flowing script.

Board Chair, UDI-EM

Copy: Chris Nicholas, Board Member, UDI-EM
Patrick Shaver, Committee Chair, UDI-EM Funding and Finance
Committee