

June 14, 2024

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

**Re: June 18, 2024 Urban Planning Committee Item 7.1 – Review and Updates to the Terms of Reference for Area and Neighbourhood Structure Plans to Incorporate City Priorities, Goals and Moves**

Dear Urban Planning Committee and Members of Edmonton City Council,

BILD Edmonton Metro is the voice and expert resource for the real estate development industry in the Edmonton Metro Region. Our more than 500+ member companies from all corners of the industry – home builders, real estate developers, renovators, financial and professional service organizations, trade contractors, and manufacturers and suppliers of all types of commercial and home-oriented products – has worked collaboratively with City Administration on numerous transformational planning initiatives like the Zoning Bylaw Renewal Initiative or The City Plan.

Our members are often asked to provide hundreds of their volunteer time, expertise, and insights on development regulations and processes – all to ensure that the private sector can support and meet the growing need for housing, and to shape great spaces and places for people and businesses to thrive and invest in. In our ongoing engagements with Administration, our collective goal has always been to continuously improve how we build and steward communities for both current and future generations.

Together, in 2010, City Administration with developers and consultants, developed Terms of Reference to guide the creation and amendment of statutory plans like Area Structure Plans (ASPs) and Neighbourhood Structure Plans (NSPs). This mutually agreed upon document has enabled relative consistency in how ASPs and NSPs are drafted and amended over time. The Terms of Reference is not a statutory plan, it is an operational document used by Administration in their daily work.

Administration initiated a Terms of Reference Modernization Project in 2023, with the goal of updating clerical issues like citations to retired plans and updates to the appendices. As original stakeholders and signatories of the



Terms of Reference, we appreciated the opportunity to engage with Administration earlier this year.

We are in alignment with Administration's proposed change to the Terms of Reference regarding density from 25 to 30 dwelling units per hectare. This change is in direct response to industry having consistently surpassed density targets, for well over a decade, in Low Density Residential areas, demonstrating a commitment to realizing the city's vision for compact and efficient land use. It is also worth noting that the development industry has and continues to advocate for a range of housing typologies, advances innovations in building design, and rightsizing of infrastructure – supporting social and economic goals.

Where we see potential conflict and unintended impacts is through the addition of climate resiliency and diversity and inclusion policies into the Terms of Reference. As these priorities are wide-ranging concepts with varying degrees of interpretation, how they are enforced and administered can create added complexity and complications for Administration, Edmontonians and industry. By the City's own account, a land use consideration includes impact on surrounding properties and environment, building size/proximity, car and roadway access, and servicing/utilities. Administration's own GBA+ and Equity Toolkit for the zoning bylaw notes how equity concerns related to people and climate should be considered as a lens, not a prescriptive rule. We recommend that the ASP/NSP Terms of Reference refer Administration and stakeholders to emerging policy work, like the Climate Resilience Planning and Development Framework, to serve as guidance. Not only would this avoid redundancy in policies to be reviewed and referenced, but it would also encompass a more holistic lens in the review of ASPs and NSPs in the planning and development continuum.

As the ASP/NSP Terms of Reference is a living document, with shared expectations between Administration and stakeholders like the real estate development industry, we are committed to the following:

**Immediate Support:** We are willing to assist Administration with ongoing changes to the Terms of Reference on clerical updates and updated density targets in the appendices.

**Addressing Broader Issues:** We are enthusiastic about supporting Administration in advancing strategic initiatives such as the Climate Resilience Planning and Development Framework, which aims to offer guidance to both Administration and the development sector. Also, it is imperative that District Plans, which we are currently seeking clarity regarding implementation and impact, serve as fundamental documents for shaping future development and



regional identity, inform ASP/NSP amendments, thereby ensuring coherence with established objectives and policies. This coordinated approach promotes sustainable development, catering to the evolving needs of current and future residents, and nurturing dynamic, resilient, and inclusive communities.

We commend the Administration for seeking opportunities to improve development processes and city-building tools, and we are available to clarify any points and continue our meaningful collaboration.

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, City of Edmonton  
           Kim Petrin, Deputy City Manager, Urban Planning & Economy  
           Travis Pawlyk, Branch Manager, Development Services  
           Jatinder Tiwana, a/ Director, Planning Coordination  
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