



June 14, 2023

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

Re: June 18, 2024 Urban Planning Committee Item 7.2- “Growth Management Framework Update - Substantial Completion Standard - Metrics, Thresholds and Supporting Information”

Dear Urban Planning Committee and Members of Edmonton City 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 economy and tens of thousands of jobs through residential, commercial, and industrial development, and stewards meaningful improvements to the built environment and the communities that Edmontonians experience each day.

Summary

Our organization has been working with Administration for over two years on Substantial Completion and is not satisfied with the result, which does not solve any of the issues provided in the report as the stated rationale. **We strongly recommend directing City Administration to focus their efforts on creating plans for growth and new opportunities for investment.** This has never been more pressing than the current moment with record high levels of immigration, a tightening rental market, and cost escalations hitting individuals and households harder than ever before. In recognition of these pressures, City Council declared a housing and homelessness emergency; the Province of Alberta has been introducing measures to enable more housing development, reduce costs and red tape; and, the federal government provided Housing Accelerator Funding for Edmonton to stimulate growth. This underscores the mutual imperative to solve housing supply and affordability problems across all orders of government.

The shared goal between the public and private sectors should be squarely focused on enabling as much new housing to be developed as possible to meet market demand and slow the increase in housing costs plaguing cities across the entire country. Concerns about the potential impacts of costs of growth will not be solved by failing to plan – these issues will only grow further while simultaneously reducing local housing supply and redirecting growth within the metro area into the regional communities surrounding Edmonton. Administration’s interpretation of the Substantial Completion policy does not serve to address any of these core concerns.

Background

In August 2023, [we communicated to Urban Planning Committee](#) the urgency of moving forward with planning the lands south of 41st avenue, which were annexed to the City of Edmonton almost five years ago on January 1, 2019 based on an urgent need for room to grow both residential and non-residential areas. At that time, we highlighted the structural housing crisis in Canadian big cities and the need to move quickly to address housing supply. CMHC had just released a report outlining a 3.5 million home deficit across Canada, which would need to be filled over and above the 2.3 million homes typically expected to be constructed by 2030 in order to bring supply and demand back into balance. Since that time the situation has deteriorated across Canada, and in January 2024, Edmonton City Council took the important step to declare a housing and houselessness emergency. In February 2024 Edmonton also received \$175 million in federal funding to support housing supply through the Housing Accelerator Fund. Clear actions are being taken to address the importance of the housing supply issue, but the substantial completion procedure represents a material step backwards and is fundamentally counterproductive.

Since 2008, the population of Edmonton has grown from approximately 750,000 people to an estimated 1.1 million within a region of 1.5 million in 2023. In the last two years alone, over 100,000 new arrivals moved to Edmonton, which is the highest percentage increase since 1981. Looking ahead – particularly as national migration into Alberta and international immigration into Canada escalates – it will be critical to accommodate this growth and change much more rapidly than we have in the past. The City Plan sets out a vision to develop and redevelop all parts of the city as efficiently and seamlessly as possible, but this will only work if artificial constraints to the market are eliminated, and no new barriers are introduced.

Last August we noted in our submission to Urban Planning Committee that Administration's report was based on a misguided assumption that no new homes would be required for development in the Future Growth Area until 2039. Unfortunately, this same assumption prevails today, even after an additional year of work and engagement with industry where critical feedback about the housing market and dwindling supply of land for development in south Edmonton is most urgent. The risk remains that the timelines proposed for planning and development are unrealistic relative to past and current market experience in south Edmonton, and there is a strong threat that price escalations for homebuyers and renters will result from this approach. The June 2024 report fails to materially improve this situation, and further clarifies that statutory planning activities will not be recommended for Council authorization until 2029 – a full ten years after the lands were annexed from Leduc to manage the imminent residential and non-residential growth pressures in south Edmonton.

Industry Recommendation

The time for decisive action and confident leadership is upon us. Our request is that Urban Planning Committee provide clear direction to City Administration to commence front-end infrastructure planning for the major systems and networks that will inform future statutory planning exercises, so that land available for growth is ready for development at the time it is required.

Next Steps

Industry's top priority is to ensure that new policy implementation strategies will not artificially constrain housing supply in Edmonton, thereby increasing costs, failing to meet consumer demand, and ultimately making the housing supply picture in Canada even worse. Unfortunately, this is what Administration's proposal to constrain future planning accomplishes.

In the past, Council and Administration have indicated 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 committed to finding innovative solutions to reduce the scope and scale of public infrastructure requirements that add costs for individual homebuyers and 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). Failing to plan for growth will not resolve this issue but only leave core questions unanswered and exacerbating supply concerns as outlined above.

BILD Edmonton Metro looks forward to supporting Council and Administration in the crucial work to supply the city with residential and non-residential opportunities as we grow. Collaboration between the public and private sectors could stimulate a significant opportunity to welcome and accommodate new arrivals to Edmonton, while innovating robust, precedent-setting tools to support housing attainability, growth and development. We encourage Urban Planning Committee to focus on the critical issues of housing supply and job creation and prepare the ground for the next million Edmontonians.

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 and Economy
Kent Snyder, Branch Manager, Planning and Environment Services
Howaida Hassan, Director, Urban Growth and Open Space
Lindsey Butterfield, Director of Government Relations and Policy, BILD Edmonton Metro
Patrick Shaver, Chair of Funding & Finance Committee, BILD Edmonton Metro
Elise Shillington, Chair of Developing & Redeveloping Committee, BILD Edmonton Metro