



May 22, 2026

City Council  
City of Edmonton  
1 Sir Winston Churchill Square  
Edmonton, AB T5J 2R7

RE: Item 4.9 | Bylaw 21499 – Zoning Bylaw Text Amendments to Implement Small Scale Residential Landscape Securities

Dear Mayor Knack and Members of Edmonton City Council:

BILD Edmonton Metro is a non-profit organization representing over 500 companies in the building and development industry. Our members are committed to shaping our region to ensure more people and businesses choose to live, invest, and thrive here. We appreciate the opportunity to provide comments regarding Bylaw 21499 and the proposed expansion of the City's landscape securities program to small-scale residential development.

BILD Edmonton Metro supports the City's broader goals of improving landscaping compliance, enhancing neighbourhood outcomes, and advancing Edmonton's urban canopy objectives. We appreciate the phased approach and short-term reduction of impact on greenfield development, which represents the bulk of housing production within Edmonton and is already well served by industry-led securities. However, we remain concerned that the proposed approach introduces the potential for significant financial, administrative and operational burdens without sufficient evidence that a large-scale city-administered securities program is the most effective, proportionate, or efficient solution. This will have a material impact on infill development in Phase I, as proposed.

We believe there is a more balanced and pragmatic approach available, one that achieves compliance objectives while leveraging systems that already exist within Edmonton's development industry.

BILD Edmonton Metro would support a model where:

- the City establishes clear landscaping expectations and standardized compliance objectives in alignment with existing programs,
- industry aligns and modernizes their landscape architectural frameworks to ensure adherence,



- developers continue to administer and enforce landscaping compliance within their communities, and
- the City focuses on oversight, auditing, and policy coordination rather than direct administration of thousands of securities

This approach would reduce duplication, minimize administrative burden, preserve capital for housing investment, and build upon systems already functioning within Edmonton’s development industry.

Our concerns with the current proposal stem from two key areas.

First, the funds that would be taken as securities represent working capital that developers and builders rely upon to purchase land, advance servicing, finance construction, and deliver new housing supply. Across thousands of projects, this proposal could potentially tie up tens of millions of dollars that otherwise would be actively invested into Edmonton’s housing market. This is particularly concerning at a time when all orders of government are emphasizing the importance of accelerating housing supply and improving affordability.

Second, the proposal creates a significant long-term administrative obligation for the City itself. Administration acknowledges the expansion will require new staffing resources, inspections, technology upgrades, and workflow changes among others. While the report references a “zero net impact to the tax levy,” industry remains concerned the city may be underestimating the long-term complexity and operational burden associated with higher security volumes.

BILD Edmonton Metro believes a more practical solution already exists.

In many developing areas, developers already administer architectural review and landscaping compliance programs that include deposits, inspections, and enforcement mechanisms. These systems are embedded within the existing development process and are often more responsive, efficient, and locally tailored than a centralized municipal program.

Industry recognizes that there is room to improve existing architectural guidelines and compliance tools, particularly as they relate to alignment with the new Zoning Bylaw. We are prepared to work collaboratively with Administration to modernize and improve these systems. However, we do not believe reinventing the wheel through a large-scale securities program is the best path forward.

As Council considers this proposal, we respectfully request:

- measurable evaluation and return-on-investment analysis as Phase 1 is implemented; and



- consideration of offsetting or streamlining other planning and development processes to reduce overall burden on the homebuyer and renter when introducing new costs, timelines or administrative requirements – all of which are ultimately passed on to the end user.

We appreciate Council's consideration and welcome continued collaboration to identify a more balanced and effective approach that supports both compliance objectives and Edmonton's housing supply goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Kalen Anderson".

Kalen Anderson, RPP, MCIP  
CEO, BILD Edmonton Metro

Copy:   Office of the City Clerk  
          Eddie Robar       City Manager  
          Kim Petrin       Deputy City Manager, Urban Planning and Economy (UPE)  
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          Brian Watters    Chair, BILD-EM Builder Technical Committee  
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