Regulatory Burden

Regarding the Pressing Need to Reduce Development Regulations in the Edmonton Metro Region

Urban Development Institute
EDMONTON REGION

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> Reducing [the] regulatory burden does not require significant deregulation or the reduction of necessary protections. **It requires governments to work with businesses to find more efficient ways to achieve public policy objectives.** For regulators, more efficient processes will have the benefit of freeing up resources to focus on the continued modernization and alignment of regulatory frameworks." [1]

Government Regulations

- Excessive regulations act to *increase* the cost of doing business.
- This can be through increasing timelines and delays, additional costs, and uncertainty – all which directly impact business.

Current Market Conditions

Low oil prices and the negative impact of COVID-19 has created a precarious economic situation. While the full economic impact is still to be determined, the early numbers are dire.

Regulatory Burden in Edmonton Metro

There are a number of areas where development regulations could be reduced.

- CCC & FAC Inspections
- Environmental Reserve (ER) Dedication Process
- Process Issues
- Required Reports
- Shared Park Development Program
- Required Wildlife Crossing Infrastructure

[1] *Death by 130,000 Cuts: Improving Canada's Regulatory Competitiveness.* The Canadian Chamber of Commerce, p. 24.

Key Message

This is a critical time and opportunity for our industry and all government partners to work together and identify regulations that no longer make sense in our current economic environment.

Finding efficiencies and reducing burdensome regulations will allow the development industry to focus on what it does best - providing innovative, affordable housing solutions that meet market demands while creating jobs and generating downstream economic returns back to all government partners.

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The Urban Development Institute – Edmonton Region (UDI-ER) would like to sincerely thank the Members who devoted their time and expertise to aspects of this discussion paper.

Executive Summary

The positive economic impact of the residential development and building industry is significant in the Edmonton Metro region. According to the Canadian Home Builders' Association National (CHBA), in 2019 alone, the industry was one of the largest employers in the region - responsible for the creation of 34,795 on-site and off-site jobs, $2.4 billion in wages, and $3.9 billion in built investment value – considered to be the largest single wealth-builder for most families.[1] While these are significant figures, the development and building industry – along with numerous other industries in the region – have been negatively impacted by economic developments over the last number of years. Along with low oil prices, in March 2020, a global pandemic attributed to the COVID-19 virus forced governments to shut down large parts of the economy. While the full impact of this shutdown is still not completely clear, there is no question that this unprecedented situation - coupled with the economic precariousness of the previous number of years - has left the Edmonton Metro region in an extremely challenging environment. One could argue that we are collectively facing an economic "new normal".

Within this context, it is crucial that both the development industry and the municipalities within the Edmonton Metro region *work together* to find efficiencies that help the economy rebound. The City of Edmonton has already acknowledged this within their recently released *Reimagine Report: Strategic Response to COVID-19.* The report states:

> Businesses, partners and residents will all need the City's support in their recovery efforts, and this will include flexibility from the City on existing regulations and controls. In addition, the City's new fiscal reality will put pressure on Administration to become more effective and develop a new, more mature risk tolerance framework that considers the interdependencies of risk decisions.[2]

One significant aspect noted above is the issue of regulations. While designed for the public good, regulations can be confusing, inefficient, and ultimately burdensome. They can considerably slow or obstruct the ability of a business to operate at full strength – and one must concede that businesses operating at full strength is exactly what the Edmonton Metro economy needs at this time. Therefore, the purpose of this paper is to spur discussion on where the development industry and municipalities can work together as partners with regards to finding efficiencies and stimulating regional economic growth through reduction of the burden of unnecessary regulations.

1. Government Regulations

1.1. What Are Government Regulations And Why Can They Be Problematic?

A government regulation has been defined as, "a rule (backed by the force of law) that "regulates" the legal manner in which people can behave and use their property – and while citizens might still be the legally recognized owner of a piece of property – such as a field or a factory – the government *regulates* how they may use it."[3] There is no question that certain regulations are necessary - often implemented for the purpose of protecting the rights and safety of citizens and ensuring the delivery of public goods and services.[4] However, what happens when they become overly burdensome or unnecessary? How can this negatively impact businesses and ultimately the economic climate in which a business operates?

Often, unnecessary government regulations act to *increase* the cost of doing business, thereby making the respective region less competitive and hurting the ability to attract and retain both people and economic resources. This invariably leads to a reduction in wages, increases in consumer prices, and a weakening of the incentives for businesses and entrepreneurs to innovate.[5] In fact, in a January 2019 survey for the Business Council of Canada, a reduction of regulatory burden was identified by 41 per cent of the country's top business leaders as the "one thing to improve Canada's business environment."[6]

Additional to the increased costs, unnecessary regulatory processes may be inefficient and unpredictable.[7] This can lead to a business's resources being diverted away from more productive activities – an issue that is particularly detrimental for small businesses, "which lack the specialized and dedicated compliance resources of larger

firms."[8] Furthermore, the true costs of government regulations may be hidden, as they are not visible in the same way that tax revenues flowing to the government are obvious and tangible.[9] There are also compliance costs to consider – money spent on lawyers, accountants, etc. – as well as the aforementioned opportunity cost of a business devoting the time, energy, and employees required to complete regulatory compliance.[10]

1.2. Narrowing The Scope To The Development Industry

The development industry is not immune to overly-burdensome and unnecessary regulations and there is a significant amount of literature that has studied this issue. As an example, in a 2012 study titled *Free Our Cities,* housing regulations in Vancouver were examined and it was determined that housing costs were unnecessarily increased due to regulations such as, "minimum parking requirements, minimum suite sizes, fire regulations, and accessibility standards."[11] Locally, in 2018, the Urban Development Institute – Edmonton Region produced a quantitative document titled *Understanding Growth and Affordability,* which illustrated the negative impacts of ever-increasing costs on those desiring to own a home. This document demonstrated the number of families that were priced out of the housing market as the average price of a home increased. In other words, increased costs (including those derived from government regulations) ultimately erode affordability, thereby increasing pressure down along the affordability continuum.[12]

2. Current Market Conditions

2.1. Federally

In Q2 2020, Canadians quickly began to feel the economic impact of the COVID-19 pandemic. As governments shut down large portions of the economy to help flatten the curve, numerous businesses were forced to close and the unemployment rate skyrocketed. While the full economic impact is still to be determined, the early numbers are dire. A recent report from the Conference Board of Canada stated that Canada's economy is expected to have contracted 25 per cent during Q2 2020 with real GDP dropping by 25 per cent.[13] More recently, on July 8, 2020, (at the time current Finance Minister) Bill Morneau provided an economic and fiscal snapshot of the nation's finances. Morneau announced that, largely due to COVID-19 federal aid, Canada's deficit for 2020-21 is expected to be $343.2 billion – up from the $34.4 billion projected prior to the pandemic.[14] Additionally, the Canadian economy is expected to contract 6.8 per cent in 2020 – a level exceeding contractions during the Great Depression and doubling that of the 2009-10 global financial crisis.[15]

2.2. Provincially

Provincially, Alberta's economy is expected to contract by 5.8 per cent in 2020 – which would be the largest decline on record in the province's history.[16] On August 27, 2020, Finance Minister Travis Toews provided Albertans with the *2020-21 First Quarter Fiscal Update*. This report predicted a deficit of $24.2 billion for this year due to the unexpected economic fallout from COVID-19 – a $16.8 billion deficit increase over what was tabled earlier in the year and a forecast not seen since the 1980s.[17] These

negative economic impacts only add to the ominous situation Alberta had already been facing over the last number of years, largely due to declining oil prices.[18]

2.3. Edmonton Metro Region

Locally, the City of Edmonton released a report in July, 2020, anticipating a budget hit of around $172 million dollars (with the best-case scenario as low as $151 million and the worst-case scenario as high as $253 million) and was expecting the financial strain to continue beyond 2021.[19] In response, the City has produced a plan titled *Reimagine Report: Strategic Response to COVID-19*, which acknowledges the economic impact both COVID-19 and the oil price plunge have had on the City.[20]

Therefore, at all three levels of government, there has been a significant economic impact. It is important to note that this economic situation is fluid, unpredictable, and evolving. However, the statistics mentioned provide context for why this is such a crucial moment for industry and the municipalities to work together in this economic "new normal".

3. Examples Of Regulatory Burden In Edmonton Metro

UDI-ER represents development companies and professionals involved in the industry, (such as planners, surveyors, architects, landscape architects, engineers, contractors, lawyers, financial managers, municipalities, and utility companies) who all play an integral role as City Builders throughout the Edmonton Metro region. For this section, various UDI-ER Members provided feedback on regulations viewed as overly burdensome and unnecessary. It is important to note that within this section, examples have been generalized as much as possible. The intention is not to reference

or point fingers at specific municipalities. Rather, while certainly not an exhaustive list, the purpose is to provide examples of where unnecessary regulations are currently increasing timelines and costs.

3.1. CCC & FAC Inspections

In order to process a Construction Completion Certificate (CCC) request during the development process, as outlined in a servicing agreement, a developer must request an inspection for each municipal improvement and submit any required test results and backup documentation.[21] The CCC process is followed by the Final Acceptance Certificate (FAC), which transfers full responsibility for a municipal improvement from the developer back to the municipality.[22] While these are obviously extremely important steps in the development process, the repairing of infrastructure for a developer to achieve a CCC & FAC can often be much too prescriptive. One developer mentioned needing to fix $360,000 worth of concrete damages in one single stage. Alternate methods for repairs should be considered, or modifications to assessments of damages, as this process has become too financially cumbersome and leads to significant difficulties with budgeting appropriately. Additionally, this causes waste and is not in line with overall environmental objectives of reducing space in landfills and limiting the use of resources.

3.2. Environmental Reserve Dedication Process

Environmental Reserve (ER) is a portion of land that belongs to a respective municipality once it is dedicated. As per the Municipal Government Act (MGA), ER is to be dedicated in its natural state (i.e. no improvements to the ER land should be

required). Therefore, a municipality and the developer should examine the land pre-development and ensure that it is the same post-development. However, in the development industry's view, some CCC's have been held up for *years* over unreasonable requirements. For example, municipalities have required developers to clear out old shacks, old cars, eradicate weeds, remove trees which *may* fall over, and even fill gopher holes. As predictability and consistency are crucial for the development industry, reasonable criteria are required for this process.

3.3. Process Issues

While the development industry understands that municipalities have certain procedures and protocols in place, a number of "regulatory burden" issues simply come down primarily to process issues. Some examples (but not all) include:

- Unnecessary and arguably unreasonable circulations of documents have been identified as a highly bureaucratic process that takes time and costs money. A particular circulation may be prone to an unnecessary number of comments due to a single overeager employee. As an example, minor tweaks to a Neighbourhood Structure Plan (NSP) require a full circulation, despite only affecting a single department. An option to expedite would be desirable, as these re-circulations push back the planning and engineering phases, which ultimately impacts construction timelines – significant given the limited season for development.
- The subdivision process can also be problematic as constant re-circulations are often required for minor changes. For example, requiring a change to a

subdivision approval due to minor changes to internal lot lines is a waste of time and resources. The subdivision approval only shows the number of lots, not the dimensions. Minor changes could occur through engineering and endorsement and should not require an update to the subdivision approval.

- Municipalities looking past the input of industry members with an Association of Professional Engineers and Geoscientists of Alberta (APEGA) designation, thereby creating unnecessary delays.
- In one instance, a developer was reducing a vehicle crossing to one lane of traffic (instead of two), and therefore needed to eliminate half of the crossing by turning one lane worth of ramp back into a sidewalk. The sidewalk/ramps were built out of non-permanent paving stones that were easy to adjust. However, to perform this simple task, the municipality ordered a topographical survey to get the elevations in this area. This was seen as a superfluous request and wasted time and added cost.
- At times there has been an obvious disconnect between various departments within a municipality. This leads to confusion and ultimately delays and additional costs for the developer. Separating zoning applications from subdivision applications is an example where there is a disconnect in communication and duplication of work.
- There has been some concern voiced that as a number of senior municipal employees have retired in the past few years, somewhat of a leadership vacuum has been created. The junior employees lack the experience and reasonable approach to development resulting in slow decision making and an increase in

bureaucratic practices. In the past, more discretion was used by administration to determine what makes sense.

- Staff turnover has also proven to be problematic. Industry members have found that after a tremendous amount of work and utility is spent cultivating a working relationship with a particular municipal employee (or employees), a staffing change will occur only to have a new employee assume the role having not been privy to the prior working relationship. Additionally, the hand-over of information has been problematic. This means starting from "step 1" again and expends a tremendous amount of time.
- Interpretation of documents can be personalized and inconsistent between city staff. There have been circumstances where contractors will price work based on the areas where particular inspectors are located.

3.4. Required Reports

In 2018, UDI-ER produced a document titled, *From Dirt to Door,* which provides an over-arching snapshot of what is involved in the process - and ultimately the cost - of taking a raw piece of land and eventually turning it into a house. *From Dirt to Door* documented approximately 45 different reports and studies that are required during this process – everything from an Area Structure Plan (ASP), to a wetland assessment, to a bird survey, and, even a walkability study. While many reports and studies are definitely important, at times, they can be unnecessary. For example:

- In accordance with Policy 6.2.5 of the Edmonton Metropolitan Region Growth Plan (EMRGP), a developer requires an Agricultural Impact Assessment (AIA)

Report. These average around $10,000 a report. Recently, when one developer purchased a ¼ section of land - which already fell under an approved plan - they were required by the municipality to complete another AIA report.

- For NSPs, there are a minimum of 17 technical reports required. Are all of these reports necessary in an environment desperately requiring regulatory reduction?
- EPCOR requires Hydraulic Network Assessment Reports (HNAs). These average around $3,000 - $5,000 a report. While previously only required at the Area Structure Plan (ASP) and NSP levels, these reports are now required at every stage below (i.e. subdivisions). Therefore, by forcing developers to produce redundant reports, more time and money are expended – resources that would be more efficiently directed elsewhere.
- Climate Resiliency Reports – the expectations are vague, unclear, and there are questions whether these should even be a requirement for the development industry. Furthermore, who from the municipalities would review these reports? (I.e. is someone specifically trained to review such a document?)

3.5. Shared Park Development Program (SPDP)

The Shared Park Development Program (SPDP) is a prime example of the negative unintended consequences of unnecessary regulations. The SPDP was created to facilitate the development of parks, including playgrounds, in developing neighbourhoods. This is a win-win in theory as it increases marketability for the developer by providing amenities earlier in the development, while the municipality benefits from having enhancements in new neighbourhoods paid for. However, as the municipality implemented a number of “bureaucratic” obstacles, it has ultimately

discouraged developers from participating in the program. In other words, the municipality created unnecessary bureaucratic requirements and essentially over-regulated itself in a program that is extremely beneficial.

3.6. Wildlife Crossings

A number of developers have provided payments to build wildlife crossings in order to have various permits approved. Additionally, wildlife crossings normally require extremely expensive reports. While industry members are certainly sensitive to wildlife, perhaps there are alternative options? Does it have to be a crossing or are there other ways to safely funnel animals within developing areas?

4. Further Discussion

"Reducing [the] regulatory burden does not require significant deregulation or the reduction of necessary protections. It requires governments to work with businesses to find more efficient ways to achieve public policy objectives. For regulators, more efficient processes will have the benefit of freeing up resources to focus on the continued modernization and alignment of regulatory frameworks."[23]

In a post-COVID-19 economic environment, many experts have advocated for the need to reduce over-burdensome and unnecessary regulations. In an article appearing in the Globe and Mail on April 23, 2020, Professor Steven Globerman argued that due to COVID-19, improving the efficiencies on the supply-side of markets will be critical for restoring the Canadian economy.[24] In the article, Globerman continues,

> Because many existing physical assets may need to be reconfigured or redeveloped for new or modified activities, governments should reform zoning and other municipal review processes to reduce regulatory red tape and other sources of costs and delays imposed on real estate developers.[25]

Furthermore, there are already multiple examples of various governments' successfully working with industries to reduce regulations, while still maintaining high levels of health, safety, and environmental outcomes. For example, back in 2001, the Government of BC began reducing two regulatory requirements for every one that was added.[26] Regulatory requirements reduced 36% by 2004 and 43% by 2015.[27] Saskatchewan, Quebec, and Nova Scotia have all implemented targets to control unnecessary regulations. In 2017, Manitoba legislatively began eliminating two regulations for every new one introduced.[28] Additionally, the Government of Alberta has recently established the Ministry of Red Tape Reduction. Working with the business community and with the goal of saving time, money, and resources for Alberta businesses, the Red Tape Reduction Initiative is tasked with reducing red tape by one third and ensuring that new regulations are free of red tape.[29]

Narrowing the scope to the Edmonton Metro region, it is even more crucial that both the regional municipalities of Edmonton Metro and the development industry work together to find efficiencies by reducing unnecessary regulations. The City of Edmonton has indicated a willingness to move towards this direction, stating in the aforementioned *Reimagine Report,*

> Through review of existing regulations, and refinement and elimination where necessary, the City can help partners to innovate, make progress, explore new ways to operate, develop and build businesses, homes, communities and generally, our city together. The City should reduce the volume and the depth of regulations on services and processes where these controls create administrative inefficiencies with limited benefits.[30]

Additionally, trade associations in the Edmonton Metro region have called for similar actions of reduced regulation. A recently released joint submission by the Edmonton Chamber of Commerce and the Calgary Chamber of Commerce states that, "the

Province must enhance the competitiveness of Alberta businesses by addressing the ever-increasing, taxes, fees and regulatory costs layered onto business from all orders of government."[31] Furthermore, in September, 2020, UDI-ER released a publication *Building our City Together: UDI Edmonton's Commentary on the Draft City Plan.* The goal of this document is to provide support for *the City Plan* (Edmonton's upcoming MDP) while also tabling ideas to work together in making the plan a success by examining numerous areas - including regulatory efficiency.

Conclusion

During the economic boom years of 2010-2014, a number of regulations were implemented. While these regulations may have been understandable at the time, in a post-COVID-19 environment, this is the opportune time to work together to find solutions to help reduce regulations that no longer make sense in this economic “new normal”. Unnecessary development regulations create delays and increase costs, thereby ultimately undermining affordability in our municipalities and our region as a whole. Finding efficiencies and reducing burdensome regulations will allow the development industry to focus on what it does best - providing innovative, affordable housing solutions that meet market demands while creating jobs and generating downstream economic returns back to all government partners.

Endnotes

[1] Economic impacts calculated by Will Dunning Inc. Economic Research for the Census Metropolitan Area. Estimates based on 2019 data from Canada Mortgage and Housing Corporation and Statistics Canada via CHBA National.

[2] City of Edmonton. *Reimagine Report: Strategic Response to COVID-19,* p. 21.

[3] Murphy R., J. Clemens, M. Palacios, & N. Veldhuis. Fraser Institute. *Economic Principles for Prosperity*, p. 38.

[4] Committee for Economic Development of the Conference Board. *Regulation & the Economy: The Relationship & How to Improve It.*

[5] Murphy, R., J. Clemens, M. Palacios, & N. Veldhuis. Fraser Institute. *Economic Principles for Prosperity*, p. 38.

[6] Business Council of Canada Survey via Financial Post.

[7] Greer, R. The Canadian Chamber of Commerce. *Death by 130,000 Cuts: Improving Canada's Regulatory Competitiveness*, p. 3.

[8] Ibid.

[9] Murphy, R., J. Clemens, M. Palacios, & N. Veldhuis. Fraser Institute. *Economic Principles for Prosperity*, p. 38.

[10] Ibid, p. 38-39.

[11] Wood, J. (2012). *Free Our Cities* via Murphy, R., J. Clemens, M. Palacios, & N. Veldhuis. Fraser Institute. *Economic Principles for Prosperity*, p. 40-41.

[12] Urban Development Institute – Edmonton Region. *Understanding Growth and Affordability: Series 2.*

[13] Beckman, K. Conference Board of Canada. *Canada's Provincial Economic Outlook — Preliminary Forecast Spring 2020,* via Edmonton Journal.

[14] CBC. *Highlights of Bill Morneau's 2020 fiscal 'snapshot'.*

[15] Ibid.

[16] Beckman, K. Conference Board of Canada. *Canada's Provincial Economic Outlook — Preliminary Forecast Spring 2020,* via Edmonton Journal.

[17] Ibid.

[18] Government of Alberta. *2020-21 First Quarter Fiscal Update and Economic Statement.*

[19] Global News. *City of Edmonton reveals 'Reimagine' plan to dig out of $172M coronavirus hole*.

[20] City of Edmonton. *Council Report_8379*.

[21] City of Edmonton. *Construction Completion and Final Acceptance Certificates*.

[22] Ibid.

[23] Greer, R. The Canadian Chamber of Commerce. *Death by 130,000 Cuts: Improving Canada's Regulatory Competitiveness*, p. 24.

[24] Globerman, S. Globe & Mail. *Governments must focus on removing regulatory barriers to labour.*

[25] Ibid.

[26] Greer, R. The Canadian Chamber of Commerce. *Death by 130,000 Cuts: Improving Canada's Regulatory Competitiveness*, p. 19.

[27] Ibid.

[28] Jones, L. Financial Post.*Every Small Business Owner in this Country has a Red Tape Story. Some are Shocking.*

[29] Government of Alberta. *Red Tape Reduction Act.*

[30] City of Edmonton. *Reimagine Report: Strategic Response to COVID-19,* p. 31.

[31] Calgary Chamber of Commerce & Edmonton Chamber of Commerce. *Backgrounder: Recommendations to reduce costs and regulatory burden on business from the Edmonton and Calgary Chambers.*

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The Urban Development Institute-Edmonton Region (UDI-ER) is a non-profit association representing the land development industry in Edmonton Metro. Recognizing that the development of land is an essential function of our economy, UDI-ER's activities and objectives focus on Building Communities Together by promoting wise, efficient and productive urban growth.

We welcome the opportunity to continue the dialogue and develop innovative solutions to preserve affordability.

Let's continue the conversation.

info@udiedmonton.com

780.428.6146

udiedmonton.com