



July 29, 2019

T.J. Keil
Chief of Staff
Office of the Associate Minister - Red Tape Reduction
Treasury Board and Finance
130 Legislature Building, 10800 – 97 Ave
Edmonton, AB T5K 2B6

Re: Urban Development Institute – Edmonton Region (UDI-ER) Recommendations for Red Tape Reduction

Dear T.J.,

It is our understanding that the Office of the Associate Minister – Red Tape Reduction has been tasked with identifying and acting upon areas requiring red tape reduction throughout the province. Through the lens of the Edmonton Metro land development industry, UDI-ER has identified three items that your office could look further into:

- **Permit Timelines & Approvals:**

- *The Issue*

- Under the Modernized Municipal Government Act, legislated approval timelines for municipalities were removed; now, municipalities with a population larger than 15,000 can establish their own timelines for approving subdivision and development applications. This has led to added unpredictability, which increases costs to projects and can risk investment. The province should mandate a reasonable timeframe for *all* municipalities to process applications. We recommend 45 days.

- *Proposed Solution*

- Delete [Section 640.1 - Alternative time periods for applications](#) of the MGA in its entirety.
 - Delete reference to Section 640.1 of the MGA from [Section 6 - Decision time limit](#) of the Subdivision and Development Regulation.

- **Approvals from Ministry of Transportation:**

- *The Issue*

- All development and construction projects are required to go through a municipal approval process. Often times, applications must *also* go to

Alberta Transportation. Whether it is a simple referral or a more in-depth review, the timelines for response from these provincial departments have become unpredictable and often time-consuming. Again, delays associated with approvals add considerable costs to projects and can risk investment.

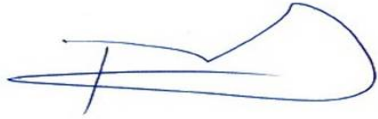
- *Proposed Solution*
 - Add timelines on permit and regulatory approvals and referrals involving the Ministry of Transportation.
 - Under [Section 14 - Distance from highway](#) of the Subdivision and Development Regulation, change the referral requirements back to 0.8 km from 1.6 km as currently contained within the regulation. 1.6 km from a highway means that the majority of applications within small and medium sized communities must be referred to Alberta Transportation. This creates additional red tape for applicants - along with municipal and provincial staff - while continuing to delay applications.
 - Under [Section 14\(e\)](#) of the Subdivision and Development Regulation, remove the words, “at the time of subdivision”. The Ministry of Transportation already receives and is to provide comment/approval on all Area Structure Plans (ASPs) in proximity to a highway. If a subdivision does not conform to the Area Structure Plan, then that ASP must be revised and approved by Council. This will automatically mean that the revised ASP must be considered by Transportation prior to approval. This seemingly minor change adds another step to the approval process and it is entirely unnecessary given an appropriate check and balance already exists.
- **Inclusionary Housing:**
 - MGA [Section 640\(4\) - Land Use Bylaw](#) had been included to allow municipalities to allow for land use bylaws to include policies surrounding inclusionary housing (subject to a regulation). It is our understanding that the term Inclusionary Housing has now been removed from the updated version of the MGA. Are we able to confirm this? Furthermore, we would like to explore the possibility of removing Inclusionary Housing from the City Charter(s).

While the aforementioned are not an exhaustive list of items requiring red tape reduction within our industry, UDI-ER believes that these can be dealt with quickly and at little to no incurred cost to the provincial government.

If you require any clarification or additional information on these items, please do not hesitate to contact me anytime.

Thank you for taking the time to listen to our recommended suggestions for reducing red tape within the Edmonton Metro land development industry.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'R' followed by a horizontal line and a large loop.

Rick Preston
UDI-ER Executive Director

cc.
UDI-ER Board of Directors
BILD Alberta