



Urban Development Institute  
EDMONTON REGION

A low-angle, upward-looking photograph of a modern skyscraper with a glass and steel facade. The building has many balconies with glass railings. To the left, a portion of an older brick building is visible. The sky is a clear, bright blue.

# Building Our City Together

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UDI Edmonton's commentary on  
the Draft City Plan

**UDI ER thanks the City of Edmonton for engaging in this conversation about the City Plan and the future of Edmonton's development. As City Builders, we deeply appreciate the opportunity to work together on the important goal of welcoming one million more Edmontonians.**

The future the City has laid out is exciting. The City Plan is ambitious, and it should be, and we look forward to playing our part in creating the vibrant, livable city it describes. We see ourselves as partners in that process, helping the City take this plan from vision to reality by building homes, commercial spaces and communities that will meet Edmontonians' evolving needs and desires, and we are eager to get started.

We believe the best way to get started is by having an open, honest and constructive conversation about how the City Plan will be interpreted and implemented. We support the high-level vision of the plan, but the specifics of how we'll get there merit careful consideration and discussion. In the immediate future, and years ahead, there are areas we hope to further define and monitor in partnership with the City to facilitate prudent, responsible growth that fits consumer demands.

One area that will require careful consideration and management is the cost of dramatically increasing density in redevelopment areas. The necessary improvements to infrastructure (including sewers, waterlines and roads) will require significant investment, and we are concerned that the cost estimates provided in the Plan don't reflect the true costs of adding such significant density.



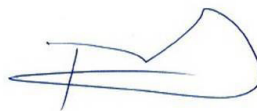
Another point on which it will be important to work together is managing the development of Edmonton's newly annexed lands. We strongly hope that the City will work proactively with developer landowners to explore ways to bring this area to market in a way that is strategically, socially and fiscally appropriate and conducive to investment. It is imperative that this plan provide the flexibility to incentivize the development intrinsic to the principles of economic, social and orderly smart growth.

There are many other aspects of the City Plan we feel are important to further explore and define – this document outlines several of them. We look forward to having those conversations with the City as we prepare to translate the City Plan from aspiration to action. We thank the City of Edmonton once again for the opportunity to have these important discussions, and we look forward to supporting the execution of the City Plan over the coming years.

A handwritten signature in blue ink that reads "Mike Kohl". The signature is fluid and cursive, with the first name "Mike" being more prominent than the last name "Kohl".

**Mike Kohl**

UDI ER Board Chair

A handwritten signature in blue ink that reads "Rick Preston". The signature is stylized, with a large, sweeping "P" and "R" that are connected, and the rest of the name is written in a more compact, cursive style.

**Rick Preston**

UDI ER Executive Director



# Your City Builders

**For generations, City Council, City of Edmonton Administration and the development and building industry have worked together to plan and develop our city.**

The interplay between the regulatory environment created by the City of Edmonton and the work of developers and builders has got Edmonton to where it is today – and as we look towards building a city for two million people, it will be through close coordination and agreement between the municipality and industry that we succeed.

Together, we are Edmonton's City Builders.

We look forward to working to build the kind of city described in the City Plan - a place that is vibrant, livable and ready to welcome one million more Edmontonians over the next several decades. We hope that this Plan will be a flexible tool in Edmonton's continued success and prosperity, subject to continuous review, refinement and reinterpretation where necessary to ensure it remains relevant and in touch with evolving market conditions.





# A Bold Vision – the Draft City Plan

**We're excited about the future set out in the City Plan. It describes a vibrant, interesting city where many people would surely like to live – a city we look forward to building, in partnership with the City of Edmonton.**

The plan provides a bold vision for us to work toward. We're eager to get to work, engaging with the City to decide on specific, concrete next steps we can take to achieve that vision. By working together, we're confident that we'll be able to maintain the advantages that current Edmontonians love and make this city an even better community over the next 10 years and beyond. This Plan is an ambitious one. We believe that's as it should be, and we're ready to get started on making it happen.

UDI ER believes the City Plan is a strong visionary document containing a number of positive, forward looking ideas, aspirations and goals. To strengthen the Plan, UDI ER would like the City to meaningfully consider a series of market based, driven thoughts as we strive together, as Partners, to make it even stronger readying our City for a Positive Future.

# Areas for Discussion & Consideration

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## Moving from Aspiration to Action

**This is a high-level plan that presents a bold vision for Edmonton. However, the Plan doesn't provide specific, prescriptive direction on how we'll make this happen.**

As those decisions are made, we hope the interpretation and implementation of the Plan will be flexible enough to ensure its success. It's important not to lose sight of market conditions, consumer demand and previous infrastructure investments in planning for Edmonton's future.

In the next 10 years and beyond, the way we grow the city must reflect the diverse ways Edmontonians want to live, work and play – that calls for a wide range of housing types across diverse areas of the city, making smart use of existing infrastructure, and ensuring that development is as financially, socially and environmentally responsible as possible. This will require the City to be flexible in executing the City Plan so that it doesn't inadvertently create barriers that undermine the plan's ultimate vision - for example by designating "no growth zones" that block responsible, logical development that would serve Edmontonians well.

## Market Demand & Affordability

**Affordability and availability of ground-oriented housing options are a major reason people move to Edmonton.**

If the City Plan doesn't take that into account, Edmonton will lose this advantage in attracting new residents. We need to be very careful not to execute the Plan in a way that undermines affordability and the benefit of housing attainability for as much of the population as we can. History shows us that adopting policies to direct growth will significantly increase housing costs.



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## Nodes, Corridors & Districts

**The Plan promotes the idea of a city built around various nodes, corridors and districts. We support this idea, however, it is important to be aware of associated costs.**

In many cases, when adding density to redeveloping neighbourhoods, all existing infrastructure will need to be replaced. This includes storm mitigation infrastructure, sewers, water lines and roads. Many of the nodes are also intended to be anchored by public transit, meaning that a significant investment in transit will also be necessary. The cost of these infrastructure upgrades will be significant if infrastructure is to meet intensification aspirations – the full extent of these costs and the implications on property taxes need to be articulated and understood.

The estimated costs we have reviewed do not appear to reflect the true cost of the infrastructure upgrades required. As things stand, we run the risk of turning proposed housing options into ones that are unaffordable and unattainable. An argument is often made about the additional marginal cost to the public purse of servicing new greenfield development – similar costs exist in servicing redevelopment, particularly where significant density is added, and we need to be realistic in considering the full cost of very ambitious intensification targets.

## Adaptability & Review Period

**After the first five years of the 10-year plan, we encourage the City to conduct an efficient review to evaluate how the plan is stewarding its key goals and objectives.**

This is the practice for the seven regional land use plans done by the GOA's Land Use Secretariat, as well as the Edmonton Metropolitan Region Board's Growth Plan 2.0.

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## Development Area Targets

**The City Plan divides Edmonton, for development purposes, into three broad areas:**

- The redeveloping area (inside Anthony Henday Drive)
- The developing area (outside Anthony Henday Drive and north of 41 St. SW)
- The future growth area (south of 41 St. SW)

The Plan outlines a sliding scale of development where more and more of Edmonton's new growth takes place in the redevelopment area. The proportion of growth to be concentrated in the redevelopment area increases at each quarter-million person increment - at 1.25 million, 1.50 million, 1.75 million and 2 million people. In the last stage of this growth, the plan calls for 80 per cent net unit growth in the redevelopment area and only 20 per cent through new development.

For this Plan to work (especially in regard to this 80/20 ratio), many thousands of people will have to move into redeveloped areas. However, there is a lack of research showing consumer demand for this. This is aspirational steering that may have unintended consequences - if people looking for low density housing can't find those options within Edmonton, they may gravitate to other municipalities just outside the city's borders that can offer them the type of housing they want.

We respect and support the Plan's goal of promoting greater density in the redeveloping area. We're concerned, though, that the plan doesn't seem to allow development in the future growth area for the next 30 years. The City Plan should not prescribe how and where people live - cities grow organically through consumer choice. Growth in the redeveloping area and the future growth area aren't mutually exclusive, and where development of the future growth area could be the most financially, socially and environmentally responsible step toward the City's goals, we feel that taking that option off the table goes against the spirit of the plan. We want a livable, vibrant, responsible city as much as anyone - we'd hate to see Edmonton tie its hands and rule out possible ways of bringing that vision to life.



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## Substantial Completion of Developable Areas

**One red flag that has been identified in the current draft City Plan is policy 2.3.2.3. The policy states that the Plan requires “substantial completion of the developing area including service provision, amenities and infrastructure prior to authorizing the preparation of statutory plans for contiguous future growth area.”**

At minimum, “substantial completion” needs to be more clearly defined. But again, we worry that this policy will limit, rather than support, progress toward the vision set out in the plan. This restriction will result in inefficient servicing of land. For instance, there is readily serviceable land on 41st Street that could be developed efficiently and inexpensively to meet future Edmontonians’ needs, but this policy in the City Plan would preclude development of that area.

Specific identification of No Growth Zones on the City Plan’s maps will unnecessarily undermine what the Plan is trying to achieve. Identifying no-growth areas, instead of designating areas as “future growth zones,” increases the risk that this plan will need to be amended because it doesn’t provide the flexibility the city needs as it grows.

Making use of existing infrastructure is a core principle of smart growth and at the heart of the City Plan. Designating “no growth zones” will block development that create communities utilizing existing services, amenities and infrastructure in adjoining areas, prohibiting smart growth.

## Employment Considerations

**Planning decisions must be based not only on raw population growth numbers but also on who is coming to Edmonton and why they are coming to Edmonton – in short what are the employment demands?**

What sort of housing is within the budget of people who come to Edmonton for the jobs that are available? Where are those jobs located? How do we ensure the market provides appropriately priced and located housing for those who are likely to move here? People move to Edmonton for opportunity and a good quality of life. As Edmonton has multiple employment hubs, will there be more work in the industrial clusters around the region, than downtown? If yes, then growth on the edge makes sense in terms of meeting market demand.

Table 1 provides a picture of the Edmonton Region (CMA) and City of Edmonton's Spring 2020 Employment Forecast. The detailed data depicts relative information for the top 16 employment sectors, thus portraying an important picture of employment demographics, both historically and forecasted into 2024. Flexibility to meet market demands now and into the future will be instrumental to the City Plan, citizens and industry.

*Table 1: Employment Outlook (Edmonton & Region)*

	<b>Edmonton CMA</b>				
	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
<b>Total</b>	744.8	761	761.1	764.1	783.3
<b>Agriculture</b>	3.5	5.9	4.7	5.5	3.5
<b>Other Primary</b>	31.8	25.6	22.9	22	25.8
<b>Manufacturing</b>	56.8	51.8	41.5	41.5	46.9
<b>Construction</b>	<b>89.1</b>	<b>104.2</b>	<b>92.3</b>	<b>90.7</b>	<b>93.1</b>
<b>Utilities</b>	7.1	6.1	6.2	10.5	8.3
<b>Transportation/ Warehousing</b>	44.9	43.4	48.2	47.2	39.1
<b>Trade</b>	114.1	107.4	111.8	117.9	113
<b>FIRE</b>	33.6	34.3	36.2	39	38.9
<b>Professional, Scientific &amp; Technical Services</b>	57.7	56.8	53.8	55.4	59.4
<b>Business, Building &amp; Other Support Services</b>	25.4	28.6	30.4	27	30.1
<b>Accommodation and Food Services</b>	50.5	47.8	44.6	45.7	45.5
<b>Education Services</b>	42.6	50.1	54.7	55.6	62
<b>Information, Cultural and Recreation</b>	24.5	24.1	23.9	24.4	22.6
<b>Other Private Services</b>	42	39.6	43.5	40.6	37.4
<b>Government Services</b>	38.9	44.2	51.7	44.8	55.4



							City of Edmonton					
	2019	2020f	2021f	2022f	2023f	2024f	2019	2020f	2021f	2022f	2023f	2024f
	791.8	746	772.3	791.4	812.2	830.5	560.1	530.3	547.1	560	576.9	591.5
	4.3	4.1	4.3	4.5	4.6	4.7	1.2	1.1	1.2	1.2	1.2	1.3
	24.7	21	22.8	23.4	24	24.6	13.8	11.9	12.9	13.2	13.6	14
	50.9	48.1	50	51.2	52.5	53.2	35.3	33.4	34.7	35.4	36.2	36.6
	<b>90.6</b>	<b>79.4</b>	<b>83.1</b>	<b>85.1</b>	<b>87</b>	<b>87.9</b>	<b>58.5</b>	<b>50.9</b>	<b>52.2</b>	<b>53.2</b>	<b>56.5</b>	<b>58.2</b>
	10	9.1	9.8	10.3	10.7	11	6.4	5.9	6.3	6.6	6.9	7.1
	42.5	39.4	42.3	43.4	44.6	45.3	29.3	27.3	29.3	30	30.8	31.3
	124.8	115.2	124.2	129.1	134	137.8	88.7	82.2	88.5	91.9	95.4	98.1
	37.1	35.2	36.1	37.5	39	40.1	27.4	26.3	26.9	27.9	29	29.9
	54.8	50.9	52.5	54.9	57.3	59.2	40.7	37.9	39.1	40.9	42.6	44
	28.3	26.7	28	29.3	30.5	31.6	20.9	19.8	20.7	21.6	22.6	23.4
	45.7	42.3	44.6	46.2	48	49.5	35.3	32.8	34.5	35.8	37.1	38.3
	58	58.3	58.1	57.9	58.2	58.6	42.5	42.8	42.6	42.4	42.6	42.9
	22.9	21.8	22.8	23.8	24.7	25.5	17.1	16.3	17.1	17.8	18.5	19
	36.7	34.2	35.6	36.8	38	38.9	25.8	24.1	25.1	25.9	26.8	27.5
	53	52.8	52.7	52.9	53.5	54.3	36.8	36.8	36.7	36.9	37.3	38

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## Getting to 80/20

**We need to make sure that the policies in the plan are not interpreted in such a manner that the approval or advancement of the subordinate plans (ASP, NSP etc) are withheld because they don't meet the goals of the 50-year City Plan.**

It's important we understand, and the plan acknowledges, that the growth and advancement of all areas of the City will be required to achieve the end state of the Plan and that different areas will advance at different time reflecting the economics, employment and values of the consumer of the day. Simply, we don't want a logical planning and development area in the greenfield area to be withheld from approval in 2027, for example, because an infill target has not yet been achieved. It must be acknowledged in the plan that these areas will grow at different times and due to different circumstances and The City Plan should not prohibit people's choice in how they live.

## Choice

**One of the foundational aspects of building a great city is ensuring that there are many different housing choices available for the great diversity of people who live there.**

There are many different ways that people choose to live their lives – some prefer the hustle and bustle of a dense urban environment, where others want a quieter, single-family home farther from the city's core. Neither choice is wrong, and in fact if we can provide the regulatory framework for people to make housing choices all along the housing spectrum, we'll best allow our City Builders to create the city that people continue to choose to move to and stay in.

The Plan, wisely, doesn't restrict non-residential growth to the core of the city. Particularly as employment opportunities grow in less central non-residential areas, housing options in "suburban" areas will provide shorter commute times in many cases than housing closer to the core. While we recognize that employment opportunities and housing at the core of the city are important, we wouldn't want the plan to inadvertently lengthen commute times and reduce Edmonton's livability for people working outside the core.



**“ Edmonton will face a number of challenges as it evolves & grows.**

**These challenges extend from revitalizing the oldest parts of the city for the next wave of growth to opening up future growth areas that have yet to experience urban development. Focused efforts to provide ongoing and new infrastructure and services to all areas of the city in a thoughtful, fiscally responsible and coordinated manner will be required.**

— Draft City Plan, Page 139

## **Proximity of Housing to Employment**

**One of the studies conducted by the City of Edmonton in connection with the Draft City Plan found that of the 550,000 jobs in Edmonton, 80,000 (or about 15 per cent) are located downtown.**

This is a significant concentration of jobs for a small geographical area, but the fact remains that most Edmontonians work in other parts of the city.

By 2065, the same study projected that there will be 1.1 million jobs in Edmonton and 156,000 will be in the core – representing a one per cent decrease in the proportion of jobs located downtown.

It's true that almost everyone prefers a short commute to a long one. In planning to build a city that offers high quality of life and meets consumer needs, it is important to consider that Edmonton is highly decentralized. Its citizens will be looking for homes close to their place of employment, and offering a range of housing options throughout the city is the only way to truly meet that need.

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## Annexed land

**As City Builders, UDI ER understands the City's long-term strategy of orderly growth and prudent financial investments.**

We strongly encourage the City to be proactive and work efficiently and effectively with affected developer landowners in the annexed lands area.

Working together, developers and the City can explore various options and scenarios for bringing this area to market in a way that will satisfy the principles dictated by The City Plan. One area we implore the City to examine and analyze further with UDI ER is annexed lands where significant private sector investments have already been made, based on an expectation that the City would help facilitate growth and meet consumer demands and expectations.

## Impact of the Pandemic

**The global COVID-19 pandemic has caused us to rethink nearly every aspect of life.**

It is too early to know what effect this will have on the way cities are built and planned, but some of the questions that are being asked already are:

- In an era of social distancing, how comfortable will people be with packing onto public transit if there are other options available?
- Does the notion of a commute get called into question? If people aren't working in and travelling to central business districts, do we need to orient cities around them to such a degree as we do now?
- Will consumers demand new kinds of built form? Will multi-generational families living together become more common, with elderly parents and grandparents living with their families in separate but attached quarters? Will more two-income families want two home offices?
- As we've seen an increased demand for private entrances, will there be a continued demand for apartment living?

We don't know the answer to these questions. But it is of paramount importance that as the answers become clearer, municipal planning frameworks are flexible enough to allow the built city that people want to live in.



# Visionary, Careful & Cautious

**Balancing the aspirational vision of the City Plan with the market-demonstrated housing needs of Edmontonians is critical to our success as a city. We cannot commit to building things people don't want to buy.**

This Plan is exciting, progressive and forward-looking. However, it will be critical that we review the plan regularly and ensure that it continues to prescribe the building of a city where people will be able to live. In short, Edmonton's City Builders support the City Plan as long as it addresses market demand – we cannot build what the market will not buy. As such, this plan needs to be flexible to facilitate growth and not dictate where it can and cannot occur.



# About Us

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**The Urban Development Institute Edmonton Region is a not-for-profit association representing the land development industry and its 166 member companies in the Region.**

Recognizing that the development of land is an essential function of our economy and the environment, UDI ER's activities and objectives, short-long term, focus on Building Communities Together with the City of Edmonton by promoting wise, efficient and productive urban growth.

## Contact

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