



Urban Development Institute  
EDMONTON REGION



#324 Birks Building  
10113 – 104 Street  
Edmonton, AB T5J 1A1

info@udiedmonton.com  
www.udiedmonton.com

P 780.428.6146  
F 780.425.9548

September 3, 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) and Ministry of Red Tape Reduction**

Dear T.J.,

Through the Office of Red Tape Reduction we are keenly aware, and most appreciative of work you are leading to identify and act upon areas requiring red tape reduction throughout the province.

Through the lens of the Edmonton Metro land development industry, we would like to offer a perspective relative to especially complex work undertaken by the land development industry and our municipal partners in areas where Area Structure Plans (ASP's) have been approved under a set of rules and are now grandfathered within Growth Plan 2.0. To provide a bit of background to this conversation, over the last couple of years, UDI-ER have been working with planning groups in various Edmonton Metro municipalities and the EMRB to prepare plans that will meet the guidelines and policies of Growth Plan 2.0.

Grandfathering allows for densities approved under the former Capital Region Board (CRB) to be carried forward, but there are differences under Growth Plan 2.0 and Regional Evaluation Framework (REF) that have caused significant extra work – costs and uncertainty for Industry, Metro Edmonton Municipalities, and the Edmonton Metropolitan Board (EMRB).

The REF requires statutory plan applications to be referred to the EMRB based on criteria defining what is regionally significant. Referring plans results in unnecessary delay and extra work to gain approvals and removes discretion for internal land use planning decisions from the municipalities. Municipalities are also exploring ways to avoid the referrals, with measures such as, creating large ASPs with NSP sub-plans, so that they don't need to apply to the EMRB on every application.

We would like to table a made in Edmonton Metro solution to improve approval processes, thus reducing cost of doing business and enhancing industry, municipal and EMRB while still meeting the intentions of the policy and Growth Plan 2.0

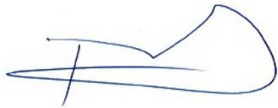
Specifically:

- **Remove** the REF requirement all together to improve overall effectiveness and efficiency of industry, municipalities and the EMRB thus enhancing regional competitiveness.

We again thank you for the opportunity to offer solutions aimed at bettering regional prosperity; we look forward to working with you, Edmonton Metro Municipalities and the EMRB to reduce uncertainty, time delays and administrative workloads going forward.



Andrew Usenik  
Chair, UDI-ER



Rick Preston  
Executive Director