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Mayor and Council
City of Edmonton
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The Canadian Home Builders' Association – Edmonton Region (CHBA-ER) supports the recommended changes to the Zoning Bylaw's Off-Street Parking requirements.

CHBA-ER is a not-for-profit organization representing 500 member companies in the region. For 65 years, CHBA-ER has taken a principled, long-term approach to building sustainable and healthy communities.

Working with the City on housing issues that affect Edmontonians — issues like affordability and choice – CHBA-ER takes pride in having open and effective engagement with the highly qualified and professional team at the City of Edmonton.

The comprehensive nature of the report in front of the Urban Planning Committee is most welcomed. For many years, industry has raised parking standards during numerous zoning bylaw amendment discussions – but the discussion was always a zone by zone, or amendment by amendment conversation. The net result was that there was never a full and satisfying exchange about onsite parking. As an issue, onsite parking was simply kicked down the road.

Many times industry has simply asked: *what is the evidence for the parking requirements?* And until now there was no response to that question.

Decades ago when the parking provisions were first implemented in zoning bylaws across North America, housing in the Edmonton context was relatively simple. There were single family houses, walk-up apartments, and a limited number of others. Parking was more or less a straight forward ask in zoning bylaws.

Today:

- There are more forms of housing than we have names for housing types;
- The region's demographics are becoming even more complex;
- Calculations of parking needs around detailed land use definitions of a building has become ever more complex; and
- It is going to get even more complex.

The range of combinations is beyond anything originally thought of when off street parking provisions were first developed.



Mission: We provide tools for members' success.
Vision: To be the go-to resource for the home building industry.

In an encouraging and refreshing approach, laid out in balanced and fact based research, City staff have come to a very rational decision - that the traditional approach to parking requirements is flawed. Evidence clearly highlights that there is no relationship between what the Zoning Bylaw requires for onsite parking and what actual land uses' need for parking.

It is also been recognized that there is no clear path to developing a standardized requirement that can stand the test of time and have the evidence to support the required level of parking that any regulations will mandate.

To say this represents a major change in the City's engagement is certainly a significant understatement. We are not aware of any large community in Canada taking this idea as far as Edmonton is suggesting. Other Cities have made similar changes, but often limited the initiative to special project areas (e.g., Calgary and Halifax), but not across the City as a whole. But the trend is clearly evident across North America – parking requirements are being pulled from municipal regulations.

We want to highlight that in developing their approach, the City's planners have been diligent in engaging CHBA-ER from the start. As a result, not only did the Association encourage its members to participate in the City's survey and review and comment on the draft reports when shared with industry, on February 21 a number of builder members were brought together to meet with the City planners leading this initiative.

Through these discussions there was clear and significant expression of industry support for the open option parking concept. While a number of concerns were raised and suggestions for further adjustments to the regulations were made (e.g., allowing loading spaces to also be drop off areas), a major part of the conversation took place around the concept of maximum parking provisions. Everyone engaged was of the same position, and wanted to ensure there was support for the type of growth the City was looking for. That is why we are very pleased to see many of the ideas raised by members echoed in Attachment 6 "*Other Regulatory Considerations.*" There is a tremendous opportunity for industry and the City to work together to address these considerations and to avoid any unintended consequences of moving to the open option concept.

In these meetings, and others that have taken place internal to the Association, everyone fully understood that this was not about saying there will be no parking, it was about placing that responsibility with those who must deliver.

It was clear in those discussions that a good portion of this will be the ever more challenging projects that have a complex mix of land uses (multiple commercial and residential uses with more than one target market). The very type of projects that will likely come to exemplify the missing middle part of the city building process. These are the projects where determining how much parking to provide is not only very complex but can be central to a project's success. It also represents a key land use that maximum parking requirements may apply to.

In all the meetings on this topic (both with City officials and internally), our members have consistently emphasized that they take great care in ensuring that their projects' parking matches the needs of their clients. Parking is such a key factor in the design and planning for any housing project that ensuring there is the right balance between providing for the consumer's needs and wants, and not overbuilding unnecessary parking is very much in the mind of all builders when they design a project:

- Not providing enough parking can render a project unmarketable and unattractive in the eyes of the consumer.
- Providing too much parking is a simple cost that cannot be recovered. A \$50,000 covered parking stall is a cost and not just a free unused stall. The concept of a good with no cost is simply flight of fancy.

Going forward, CHBA-ER is looking forward to reviewing the details of the amending bylaw when it comes forward. The conversation that will be generated by the “*Other Regulatory Considerations*” will be equally important. We all want to avoid unintended consequences.

Finally, I think we can all agree that the reduction of required parking does not mean that parking will not be provided, but it does mean that the City need not to expend resources pursuing a constantly moving target. Municipal nimbleness to accommodate change in an extremely dynamic market place has always been challenging.

It will also be a significant step forward in supporting opportunities to develop more market affordable housing, to permit a wider range of housing choices and may even assist more family friendly housing to be built in areas of higher density development.

This change will also surely generate resource savings on both sides (industry and municipal). Time spent calculating the number of stalls to meet a zoning requirement and the time to review to confirm they are there can now be spent on much more useful and productive work. This is a win/win in the best sense of the phrase.

In conclusion, the recommended move to amend the City’s Zoning Bylaw to:

- Embrace an open parking option process;
- With consideration for maximum parking in well-defined circumstances; and
- With an engaging conversation to address the other related regulatory considerations;

is clearly the best option and an approach strongly supported by the Canadian Home Builders’ Association – Edmonton Region.

Thank you for considering our views on this important item.

Sincerely,



Bryce R. Milliken
President, CHBA-ER, (Partner, Ogilvie LLP)