

**August 29, 2023**

Mayor and Council  
City of Edmonton  
1 Sir Winston Churchill Square  
Edmonton, Alberta T5J 2R7

**Re: City of Edmonton: August 29, 2023, Urban Planning Committee Meeting item 7.1 Growth Management Framework Update - Substantial Completion Standard - Additional Information**

Dear Mayor and Council,

The Canadian Home Builders' Association-Edmonton Region (CHBA-ER) is a not-for-profit organization representing 400 member companies in the region including builders, renovators, land developers, trades, suppliers and more. The residential construction industry in the Edmonton Region is a network of local businesses that represents 40,000 jobs, \$3 billion in wages and \$6.4 billion in built investment. CHBA-ER advocates for housing affordability and providing choices for quality homes.

Our industry has been actively engaging in the City Plan implementation, including the Growth Management Framework and Substantial Completion Standard. There are significant industry concerns with the Substantial Completion Standard, and restricting future growth opportunities.

The advantage we have with housing affordability must be maintained to keep our region thriving. Restricting housing supply has proven to negatively impact housing affordability in other municipalities. While the administrative Council Report outlines the potential impacts to housing prices, this section of the report is very simplistic and anecdotal. We recommend the administration do a jurisdictional scan of other municipalities who have policies constraining greenfield growth and the direct impact restricting supply has had on housing affordability. The City Plan outlines how the City of Edmonton will grow to 2 million people. As City-Builders, we need to be prepared to accommodate an influx of newcomers and provide housing choice to accommodate the growing market needs. Edmonton is one of the most affordable cities in the country, and currently celebrates having attainable market-affordable homes.

In addition, we have identified numerous concerns with the methodology outlined throughout our engagement. It is critical that the substantial completion standard utilizes accurate data to support the policy. This should include direct discussions with developers to better understand what's happening on the ground, and how to best identify the current and planned development of communities. If the substantial completion standard is planned to restrict growth based on current development, the accuracy of the data in supporting this policy cannot be understated.

Finally, we recommend the substantial completion standard assess completion by quadrant. There is rapid continued growth in the South of the city due to current market demand. Restricting growth in the south based on an assumption that people wanting to move to Edmonton will find a home somewhere else within the city is misguided. Given the competitive nature of the region, consumers wanting to live on the south side of the city may choose a different municipality to the south that can accommodate their location preference at a more attractive price.

**Edmonton Region**

**Canadian  
Home Builders'  
Association**



As we approach 2024, industry will continue to provide insight and collaborate with Administration and Council on the substantial completion standard through the Growth Management Framework.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Laura Bruno', is positioned above the typed name.

Laura Bruno  
Chief Executive Officer  
Canadian Home Builders' Association – Edmonton Region

**Canadian Home Builders' Association – Edmonton Region**

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