



PUBLIC SUBMISSION FORM

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I have read and understand the above statement.

ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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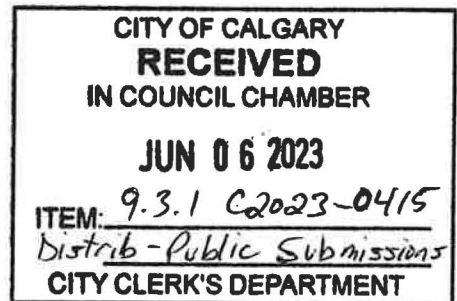
I have read and understand the above statement.

First name (required) Brenda

Last name (required) Erskine

Are you speaking on behalf of a group or Community Association? (required) Yes

What is the group that you represent? Crescent Heights Community Assoc. Planning Committee





PUBLIC SUBMISSION FORM

What do you wish to do? (required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

(required - max 75 characters)

9.3.1 Housing and Affordability Task Force Recommendations, C2023-0415

Are you in favour or opposition of the issue? (required)

In opposition

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below. (Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video). If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Crescent Heights Community Association's planning committee recognizes the importance and critical need for affordable housing throughout Calgary. We encourage bold initiatives to meet the needs of today, and future residents. However, after reviewing the Recommendations and their associated actions we urge Mayor and Council not to accept them in their current form. We have itemized eight major issues in our submission, reflecting our most important concerns. On a broad level, the Recommendations lack depth, background and data. They read as if affordable housing is required for all housing stock over the entire City of Calgary, rather than providing a segment of the housing stock in this form. While some of the recommendations have merit, they suggest sweeping changes that will affect existing and future citizens in all communities. If backed up with some verifiable research and data, the recommendations might be more acceptable and understandable to citizens.



Crescent Heights Community Association
1101 – 2 Street NW, Calgary, AB T2M 2V7

June 1st, 2023

Mayor Gondek and Members of Council,

The Crescent Heights Community Association Planning Committee (CHCA) would like to take this opportunity to offer feedback on the **Housing and Affordability Task Force Recommendations (Recommendations)**, released to the public May 4, 2023.

While there is no formal mechanism for feedback from the community or individual citizens, the Task Force says its recommendations should *“be contemplated and discussed by Calgarians.”*

First, CHCA recognizes the importance and critical need for affordable housing throughout Calgary. We encourage bold initiatives to meet the needs of today, and future residents.

However, after reviewing the Recommendations and their associated actions **we urge Mayor and Council not to accept them in their current form**. We have itemized eight major issues in this letter reflecting our most important concerns.

On a broad level, the Recommendations lack depth, background and data. They read as if affordable housing is required for all housing stock over the entire City of Calgary, rather than providing a segment of the housing stock in this form. While some of the recommendations have merit, they suggest sweeping changes that will affect existing and future citizens in all communities. If backed up with some verifiable research and data, the recommendations might be more acceptable and understandable to citizens.

For the purpose of providing feedback, we offer the following areas of concern or comment.

1. Terms of Reference

Under the Terms of Reference for the task force in subheading 3, Scope is written:
“• Surveys/reviews of existing programs, policies, and solutions both locally and in other relevant jurisdictions.”

As presented to the public, the recommendations offer no information on the breadth of this required survey or review. There is no detail on how many communities or policies were reviewed and compared to the experiences in Calgary. It would be valuable for citizens to understand what was reviewed.

- *Advice and policy recommendations relating to increasing, measuring, and managing Housing Affordability and Affordable Housing along the entire housing continuum.*

We note that the Recommendations contain no reference relating to "...measuring, and managing...". There is no data on the current need for affordable housing, nor the anticipated future need. There is no data showing how much affordable housing currently exists and how it is distributed. There is no description of how those numbers could be tracked in order to stay within the anticipated needs.

In 2018, the City of Edmonton adopted a goal of 16% affordable housing in every community. This was based on extensive data collection, analysis and the development of the [Edmonton Affordable Housing Strategy 2016-2025](#). Updates to the strategy in 2018 identified specific neighbourhoods that exceeded, met, or did not meet that goal.

We respectfully request that a similar level of detail be completed and shared with the public before any of the Recommendations are considered by Council.

The Recommendations repeatedly refer to "...*low-income individuals, Indigenous people living in Calgary, and Equity-Deserving populations.*"

The term "*equity-deserving populations*" needs definition, and we object to the insinuation that all Indigenous people living in Calgary require affordable housing. The Recommendations fail to explain how, and why, these groups were segmented and identified.

2. Recommendation 1: Action 'a'

a. Include policy in the Municipal Development Plan immediately that every Local Area Plan should enable a minimum of 15% of the total housing units to be non-market Affordable Housing (as defined by The City) to provide equal distribution across the city

Though CHCA can support 15% of total housing units across the City, the action does not "...*provide equal distribution across the city*" when attached to LAPs. LAPs are currently being implemented only in Calgary's established areas and will take many years to complete throughout the city. Crescent Heights is in the first of only two LAPs currently adopted.

For equality, a 15% target must be supported by an evaluation of what exists and where, so one community is not overly represented and others not. The target should also be influenced by readily available land that can be developed as non-market housing without delay.

1. Recommendation 1: Action 'd'

"d. Prepare the necessary bylaws to immediately:

1. Make the base residential district Residential - Grade-Oriented (R-CG) with guidance for single, semi-detached, row and townhouses into a single land use district. "

The CHCA strenuously objects to this “**action**”. Our reasons are outlined below:

- I. This is blanket up-zoning of the entire city, requiring the support and understanding of all Calgarians in all types of neighbourhoods;
- II. R-CG units do not add to non-market housing;
- III. R-CG units, especially in the established areas, are not sold at a price point that would be defined as affordable housing for the target groups identified. With the assistance of a local realtor, we present the following stats to support our position: The average selling price of newly built 4-plexes in the established areas, from 2020 to now, was approximately \$619,000, with the most expensive being \$775,000. The 75 RCG sold listings are available for your review at this link: [Matrix Report](#). Active sales range from \$499,900 to \$819,000. Builders of R-CG units often complete one unit, list it, and incomplete units are sold from that point of sale. This means a portion of sales are not included in MLS and are not reflected in the numbers provided above. In addition, R-CG is a condo. Initial condo fees range from \$100-\$300 per month, in addition to a mortgage payment. A reserve study is required every five years and typically increases significantly. Thus, an “average” R-CG unit sold for \$700,000 is likely to cost the owner more than \$4,000 per month in mortgage payments, condo fees, utilities and taxes.
- IV. Other major Canadian cities have found that density alone does not create affordability. If the objective of the Task Force is to increase the availability of affordable housing, its focus should focus on that effort. Please see the following links to a CBC video as well as a pdf presentation titled [The Final Undoing of the “Law of Supply and Demand”](#) by Patrick M. Condon, UBC Professor of Urban Design and author of [Sick City](#). Professor Condon explains how increased density produced the opposite of affordable housing in Vancouver. “Boosting allowable density to increase housing supply inflates land prices such that hoped for affordability gains are lost.” (p.99, Sick City).
 - A. [Who is buying property in Vancouver](#) and [The final undoing of the law of supply and demand](#)
- V. We believe this Action will result in compromising the property values and the structure of stable communities by eroding willingness to invest in existing housing. When there is no certainty on what kind of dwelling will occupy your neighbour’s lot, people are less likely to commit to renovation or reinvestment in an existing dwelling.
- VI. There is an enormous difference between 45% lot coverage and 60% lot coverage. The effect on permeable land; ability to plant or maintain existing trees; shadowing and loss of privacy; and an inability to provide adequate amounts of outdoor amenity space, are all in peril. The loss of mature tree canopy translates to significant loss of GHG sequestration which cannot be immediately replaced. New plantings take 40 to 60 years to mature. The loss of permeable land, trees, and green space contributes to biodiversity loss, further impacting climate resilience.
- VII. Mayor and Council have declared a Climate Emergency. More focus on environmental sustainability needs to be considered in these Recommendations. The most environmentally sustainable home is the one already built. A recent Statscan study,

Urban Greenness says: "More people means more homes, and urban densification and expansion can reduce the quantity and quality of 'green' areas and increase the 'grey areas that consist of buildings, impervious surfaces, bare soil and low density vegetation. 70% of the total land area in Canada's large urban population centres (100,000 or more people) was classified as green in 2019. Montréal (70%) and Vancouver (68%) were the greenest among Canada's five largest urban centres, followed by Toronto (65%), Edmonton (60%) and Calgary (42%)." The only major centre less than Calgary was Winnipeg.

- VIII. The blanket introduction of R-CG in the few remaining communities with rich heritage assets will further endanger these finite resources that are rapidly disappearing throughout Calgary.
- IX. R-CG development is done primarily by developers who have no vested interest or involvement in the communities they are building in. This is a for-profit enterprise that further removes the elusive "missing middle" in the form of affordable housing (largely single family) and replacing it with this compact form. To maintain diversity and choice in housing, R-CG should only be included on a case by case basis, or as determined by the community as part of the Planning process.
- X. Blanket up-zoning does not ensure a diversity of housing styles and ranges of affordability.

II. Enable secondary suites and backyard suites on one parcel of land.

CHCA supports this action and recommends expanding it to include multiple suites. This would be a positive incentive for heritage retention, through adaptation such as suites, while contributing to housing forms that would add affordable options.

2. Recommendation 1: Action 'e'

e. In the new Land Use Bylaw: 1. Remove minimum parking requirements in all residential districts

CHCA does not support this recommendation. A dense community with a variety of housing forms close to the City Centre, we have dealt with parking concerns for years. Our streets are narrower than the residential streets in newer neighbourhoods and parking is at a premium because we are close to downtown and two main streets. We support "no minimum parking" on a case by case basis only, dependent on transit and employment access. With permit parking costs rising sharply, this becomes another barrier to affordability.

3. Recommendation 1: Action 'h'

h. Advocate to the Government of Alberta for legislative change to the Municipal Government Act to allow affordable housing to be defined in a manner that exempts it from certain planning process requirements such as public hearing, which increases certainty and reduces timelines for developers and providers.

The CHCA firmly believes that NO housing form should be exempt from public hearing or other planning processes. We would support a refinement and simplification of processes for proven providers of non-market housing. All Calgarians must retain their ability to voice their opinions on land use related matters, no matter what perceived good may come of the proposal. Neither the Municipal or Provincial governments can anticipate what extenuating circumstances may make what seems like a good proposal, inappropriate.

4. Recommendation 2: Action 'a' and 'c'

- a. Dispose of City-owned lands as soon as possible within Transit Oriented Development sites suitable for housing, including non-market housing.*
- b. c. Identify City-Owned parcels of land that collectively can be made shovel ready for Affordable Housing (minimum target of 1,000 units). Business Units may need to rationalize future use of said lands that are not needed, in whole or in part, for their intended primary use.*

We have grouped both actions together as they involve the disposition of City-owned land for the purposes of providing an opportunity to build non-market housing. It is well known that one of the biggest barriers to building adequate amounts of non-market housing is the cost of land. We support the allocation of said “public lands” for this use but recommend the following considerations should be also under the action:

- That the City explore the leasing option for public land so ultimate control of the developments can be held by the municipality (no foreseeable opportunity to gentrify the housing to something other than affordable);
- Outline the “test” for applicants to qualify for building non-market housing;
- Any lease or sale must include a clause that the product must be developed in a certain length of time, or the land will be repossessed; and,
- The land must be developed with a certain percentage of affordable units (100% would be ideal in these circumstances).

5. Recommendation 5: Action 'a' 'i'

a. Advocate to:

i. The Provincial Government to dedicate a portion of the Municipal Reserve for the purpose of establishing land banks in all new communities for Affordable Housing. (Example: 1/5 of the overall 10% dedication).

Though CHCA would not be directly affected by this action, as citizens of Calgary, and fervent believers in the importance of the natural environment on the health and wellbeing of our City, we cannot support this recommendation action under any circumstances. We strongly support developing a land bank, but not at the cost of potential green space in an increasingly dense City. We recommend that 2% of the developable land only (after MR deduction) be placed in the land bank.

Please see our reference above to the Statscan study Urban Greenness

6. Recommendation 5: Action 'b' and 'c'

b. Enact a municipal bylaw under s. 364 of the Municipal Government Act to exempt properties held by non-profit organizations providing non-market housing from the municipal portion of property tax.

c. Advocate to the Province to exempt properties held by non-profit organizations that are providing non-market housing from the provincial portion of property tax.

CHCA supports a **short term** tax break for non-market housing, but this temporary removal should only apply to 100% non-market housing. Property taxes contribute to many Municipal and Provincial Services and do not constitute a high enough percentage of operating budgets to hinder providing non-market housing.

Thank you for your consideration of our concerns and comments regarding this report.

Sincerely,



Brenda Erskine, Director of Planning CHCA

(Prepared by members of the Crescent Heights Community Association Planning Committee)



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I have read and understand the above statement.

First name (required) **Leanne**

Last name (required) **ELLIS**

Are you speaking on behalf of a group or Community Association? (required) **Yes**

What is the group that you represent? **Rutland Park Community Association**



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What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

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What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#).)

(required - max 75 characters)

9.3.1 Housing and Affordability Task Force Recommendations, C2023-0415

Are you in favour or opposition of the issue? (required)

Neither

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Comments - please refrain from providing personal information in this field (maximum 2500 characters)

While we are supportive of assuring affordable housing is available to both current and future residents of Calgary, we have some concerns with the recommendations in the report. We hope that Council will take these into consideration and make some revisions. Thanks.



Your Community, Your Association, Your Voice

June 1, 2023

Re: The Housing and Affordability Task Force Recommendations

Dear Mayor Gondek and City Councillors:

We appreciate the time and effort that has gone into creating the Housing and Affordability Task Force Recommendations. We also believe that access to affordable housing is critical to current and future residents of our city. **We do, however, have concerns with some of the recommendations that have been put forward in this document.**

1. The current recommendations undermine the LAP process by recommending R-CG as the base residential district. Administration has stated throughout the evolution of LAPs that there will not be blanket rezoning—this recommendation would indeed equate to blanket rezoning.
2. The recent Stats Canada Study on urban greenness (<https://www150.statcan.gc.ca/n1/daily-quotidien/210817/dq210817b-eng.htm>) indicates that Calgary is already the least green of all major Canadian cities at 42%. In a Climate Emergency, allowing 60% lot coverage everywhere (rather than 45% for R-C1 and R-C2 lots) will make matters much worse.
3. Across the City, there are many small local parks that are showing an R-C1 designation. These park spaces need to be protected and exempted from any redesignation to R-CG.
4. The recommendations are intended to create and protect affordable housing. Blanket rezoning will, in fact, have the reverse affect. Unfortunately, regular property tax hikes, insurance increases, and residential parking zone fees in higher density communities are kicking the smaller landlords out of the market. The older homes with illegal suites are also very expensive to bring up to the minimum standard set by the City. Many to most of those buildings (16000 by City estimates) will be purchased by developers if 8 units are automatically permitted on the same lot. **This will lead to a drastic decrease in what are currently affordable suites.** Units that are now being developed on R-CG properties under the guise of affordable housing are actually much more expensive than existing suites.
5. Council and residents need more specific details on where affordable housing is currently provided and what our future needs will be. **With the Federal government offering billions of dollars in support of housing cooperatives, serious consideration needs to be given as to how to access this resource.**



Your Community, Your Association, Your Voice

6. Equal distribution of 15% affordable housing will be difficult to achieve at this point if it is not already factored into our newer communities—this increases the pressure on our established communities.

After a preliminary review of the document we would like to point out some specific concerns by item number—these being major concerns we have identified, not the only concerns.

Recommendation 1 Action d (i)

We strongly object to this recommendation to make R-CG the base residential district. Concerns have been raised throughout the planning phase for LAP's (including the Developed Areas Guidebook and the Guidebook for Great Communities) that there would be blanket rezoning once these documents were implemented. Our community already exceeds the 15% base recommendation for affordable housing. We are a complete community and only 12% of our residences are currently zoned R-C1, with 60% of our residences located on property designated higher than R-C2. We already exceed the 60 year MDP density target in our community, and this proposed change would restrict housing diversity and choice in our community of Rutland Park. (The other 2 communities we represent already exceed or are set to exceed the target by 300 and 500 percent (Lincoln Park and Currie Barracks).)

Recommendation 1 Action e

We are strongly opposed to the removal of minimum parking requirements for development. We are already under institutional pressure from Mount Royal University with regards to parking. It is not only the parking that is a concern, but the traffic generated in our community by people driving around looking for free parking. This recommendation would make matters even worse.



Your Community, Your Association, Your Voice

Recommendation 1 Action h

We are vehemently opposed to exempting any development from a public hearing process, including affordable housing. Citizens deserve to have a say about proposed developments that will impact them. This becomes a slippery slope as developers argue that "x" percent of the development will be non-market housing.

Recommendation 2 Actions a and c

We want assurances that small local park spaces currently designated R-C1 will be protected as the City looks to quickly sell off available land.

We ask that you take the time to more completely engage with Calgarians before making final decisions on the Housing and Affordability Task Force Recommendations. We look forward to being involved in this process. Thank you for your time and consideration.

Sincere regards,

Leanne Ellis
RPCA Executive VP and Director Development and Traffic



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I have read and understand the above statement.

First name (required)

Jeff

Last name (required)

Binks

Are you speaking on behalf of a group or Community Association? (required)

Yes

What is the group that you represent?

LRT on the Green Foundation



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What do you wish to do?
(required)

Submit a comment

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What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

(required - max 75 characters)

Written Submission For Agenda Item 9.3.1

Are you in favour or opposition of the issue? (required)

In favour

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below
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June 2, 2023

Calgary City Council
The City of Calgary
Office of the Councillors (8001)
P.O. Box 2100, Station M
Calgary, AB, Canada T2P 2M5

Re: Housing Affordability Task Force

Dear Councillors,

The Green Line LRT has always been more than just a train. It has always been about how best to use transit to build a city by linking it together with land-use. The LRT on the Green Foundation's participation in this process has taught us the conversation around land-use is the most important one in terms of building a transit-oriented city. With that in mind, we would like to urge Council to adopt all of the recommendations of the Housing Affordability Task Force, and to specifically support:

Recommendation 1(f) - Complete City-initiated land use re-designations by Q2 2024 to:

- I. Implement R-CG as the base residential district across Calgary.
- II. Implement Housing-Ground Oriented (H-GO) in residential areas within proximity to transit, main streets and other corridors

People do not have to live in Calgary long before they learn that our city is full of transit deserts. These are communities where the need to own a car is almost unavoidable as the population density does not support frequent transit service. This excludes many Calgarians from living in the neighbourhoods that they desire simply from a transportation perspective, let alone an affordability one. Implementing R-CG as the base district across Calgary not only increases the opportunity for Calgarians to live in the communities they desire, but it will also go a long way into making the 30 minute basic transit service proposed in RouteAhead to be supported by ridership numbers that make it fiscally sustainable.



LRT on the Green

It is also extremely important to apply the concept of affordability to the level of taxation in Calgary. Last fall, City Council approved a four year capital budget plan that had more than \$5 billion devoted to simply maintain the infrastructure of a sprawling city. Creating a more compact growth footprint for our city is a financial imperative. This is reinforced by the 2019 State of the City Report that was presented to Council and states the following:

The updated (Cost of Growth) analysis finds that achieving the Municipal Development Plan and Calgary Transportation Plan goals would result in societal savings of \$16.8 billion in capital costs going forward over the next 60 years, and annual operating cost savings of \$260 million by 2070.

Over \$16.8 billion in capital cost savings pays for a lot of infrastructure within the existing city footprint, such as the completion of the Green Line LRT, while allowing Calgary to maintain a competitive tax structure. Growing inward and not outward just makes financial sense but it is unfair to ask a small percentage of Calgary communities to bear that burden while every Calgarian will benefit in terms of affordability.

Implementing R-CG as the base residential district across Calgary ensures that density growth is sprinkled across the entire city so that the impact will be as light as possible on individual communities. At the same time, it will improve the livability and affordability of every community. Implementing H-GO in proximity to transit ensures that communities that receive large capital investments are doing their fair-share to ensuring there is a return on that investment. The amenities, services and businesses every Calgarian wants to have close to home can only be supported if there are enough people living close by.

No longer should the residents of Deer Run, Hawkwood, Marlborough or similar communities be asked by City Council to pay more in taxes just so the residents of Elbow Park can avoid density. No longer should Calgarians have to live in transit deserts and be forced into car ownership because there isn't the population density required to sustain adequate service. Now is the time to start building a better, more affordable Calgary. Now is the time for Council to say yes to these recommendations.

Best Regards,



Jeff Binks
President - LRT on the Green



LRT on the Green



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I have read and understand the above statement.

First name (required)	Michael
Last name (required)	Read
Are you speaking on behalf of a group or Community Association? (required)	Yes
What is the group that you represent?	Elboya Britannia Community Association



PUBLIC SUBMISSION FORM

What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

{required - max 75 characters}

Item #9.3.1 Housing and Affordability Task Force Recommendations

Are you in favour or opposition of the issue? (required)

In opposition

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below
Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video)
If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The Housing Affordability Task Force Recommendations should be shelved until a more fulsome analysis with supporting data is provided, and public engagement conducted because:

- 1. it will not solve affordability problem**
- 2. it undermines the MDP, LAPs, LUB, and forcibly changes the property rights of thousands of Calgarians.**

We have statutory processes in place for a reason, and they should not be arbitrarily revised based on a report written by unelected individuals, with very limited citizen input and a focused point of view.

We urge the Mayor and Council to not accept the Report, and to instruct the Administration to revise the Report by deleting Recommendation 1 and review the remaining recommendations with a more fulsome, data driven, and balanced analysis involving public consultation.

Respectfully,

The Board

On behalf of the Elboya Britannia Community Association.

Mayor Gondek and the Councilors of the City of Calgary
Calgary City Hall, 800 Macleod Trail SE
Calgary, AB T2G 5E6

Dear Mayor Gondek and Councilors:

Re: June 6, 2023 Council Meeting, Item 9.3.1 Housing Affordability Task Force
Recommendations

The Elboya Britannia Community Association supports the City taking steps to improve Calgary's housing affordability. However, the *Housing and Affordability Task Force Recommendations* (the Report) was created by a task force with limited participation and a focused point of view. The Report does not give details, analysis, or data to justify the recommendations, and there was no public or resident input.

We do not support the Report as is. We ask that it be shelved until a more fulsome analysis, and supporting data, is provided, and public engagement conducted.

We offer some specific issues with the recommendations outlined in the Report.

Housing Affordability: Recommendation 2 through 6.

In general, we support Recommendations 3 through 6. They are bold initiatives that may offer solutions to address the stated affordability crisis. But there needs to be a deeper, more balanced analysis.

For example, *Recommendation 2: "Make more land available"* is particularly unbalanced. There needs to be a balance between City-owned land allocated to Affordable Housing with the need for City-owned land to be allocated for creating more green space and urban tree canopy. The Council declared a Climate Emergency recently, and eliminating green space to provide affordable housing would sacrifice one stated emergency for another. Instead, the City needs to take into account all its stated crises in its decision making, and preserve green space and tree canopy.

Recommendation 1. Make it easier to build housing across the city

We are profoundly concerned with *Recommendation 1* for two main reasons:

1. It will have no positive impact on Housing Affordability

This is an "increase housing density at any cost" initiative that will have minimal positive impact on affordable housing.

There is existing evidence from Vancouver that these types of actions do not increase affordability.¹ Instead, they replace existing structures with more, but just as expensive, structures, and promote rent seeking activity. In some cases, they reduce affordability by replacing a moderately priced older house or duplex with more expensive built forms. This may increase tax revenues and buoy public coffers but will not solve affordability, the stated crisis.

2. It undermines existing statutory documents and process

2.1 Land Use Bylaw (“LUB”)

Recommendation 1 appears to completely change the LUB.

Recommendation 1, Action d seeks to combine the hundreds of regulations in the existing twelve Part 5 Low Density Residential Districts into one R-CG district. The multiple residential districts in the current LUB provide some level of redevelopment predictability for residents.

We realize that through the Direct Control redevelopment process currently being pursued by the developers, different built forms can be proposed and there is no absolute certainty. However, the statutory redesignation process allows resident input and residents to influence the redevelopment.

With one district, there will be no predictability or resident input about what type of built form could replace an existing dwelling. This might be convenient for the development industry, but it is hard to imagine how the industry could be effectively governed without some level of reasonable regulations. Instead, the developer will decide what they want to build to maximize their profit – this does not align with affordability.

Recommendation 1, Action f will then force blanket upzoning of all residential Calgary to this one district. Hundreds of thousands of property owners in Calgary will have their property rights arbitrarily changed without their consultation or consent.

2.2 Existing Densification Process: Municipal Development Plan & Local Area Plans

Calgary already has a robust, well thought out process for addressing our future growth needs. It is entrenched in statutory documents that have gone through review and public engagement. The Municipal Development Plan (“MDP”) clearly specifies the process through the creation of Local Area Plans (“LAPs”) that include significant public engagement.

A fundamental feature of the LAPs is specifying where low density housing urban forms will be supported. LAPs specify that “two or more units are supported on all parcels” and “three or more units are supported on corner lots”. If there is only one R-CG district the LAPs will become meaningless with respect to low density housing. In short, *Recommendation 1* may eviscerate the intent of the LAPs and put countless tax dollars and planning efforts to waste.

¹ Condon, Patrick, *Sick City: Disease, Race, Inequality, and Urban Land*, Off the Common Book, Amherst MA 2021 https://uploads-ssl.webflow.com/5efd1c1c4e2740c1bb1bfb69/60001a4f82797d502d088dcf_Sick%20City%202021.pdf



Conclusion

The Housing Affordability Task Force Recommendations should be shelved until a more fulsome analysis with supporting data is provided, and public engagement conducted because:

1. it will not solve affordability problem
2. it undermines the MDP, LAPs, LUB, and forcibly changes the property rights of thousands of Calgarians.

We have statutory processes in place for a reason, and they should not be arbitrarily revised based on a report written by unelected individuals, with very limited citizen input and a focused point of view.

We urge the Mayor and Council to not accept the Report, and to instruct the Administration to revise the Report by deleting Recommendation 1 and review the remaining recommendations with a more fulsome, data driven, and balanced analysis involving public consultation.

Respectfully,

The Board

On behalf of the Elboya Britannia Community Association.

ELBOW PARK RESIDENTS ASSOCIATION

Saturday, June 3, 2023

Jyoti Gondek
Office of the Mayor
The City of Calgary

Re: Housing and Affordability Task Force Recommendations

Dear Mayor Gondek,

Elbow Park Residents Association (EPRA) would like to express our concerns with the Housing and Affordability Task Force report.

We understand & appreciate both the need for affordable housing and the complexities involved in meeting the needs of vulnerable populations in our city. However, we are opposed to broad land-use changes made without public input, especially in such a rushed manner and we strongly object to recommendations for blanket up-zoning and the removal of single-detached housing policies. Furthermore, there is a lack of clarity in how The City defines terms such as “non-market affordable housing” and “equity-deserving populations”.

Given the magnitude of the proposed changes, the rushed time frame, the lack of public input, the ambiguity, and most importantly, the lack of evidence that densification correlates to affordability, we respectfully request that you vote against or, at minimum, delay the adoption of these recommendations on Tuesday, June 6.

Sincerely,

On behalf of the EPRA Board:

Don Ballance, Magda Dizep, Marija Foster, Tracey Johnson, Hails Kirker, David Newby,
Lisa Poole, Martina Walsh

.cc Courtney Walcott



PUBLIC SUBMISSION FORM

Please use this form to send your comments relating to an upcoming Council or Committee matter, or to request to speak on an upcoming public hearing item.

In accordance with sections 43 through 45 of [Procedure Bylaw 35M2017](#), the information provided **may be included** in the written record for Council and Council Committee meetings which are publicly available through www.calgary.ca/ph. Comments that are disrespectful or do not contain required information may not be included.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

Personal information provided in submissions relating to matters before Council or Council Committees is collected under the authority of Bylaw 35M2017 and Section 33(c) of the *Freedom of Information and Protection of Privacy (FOIP) Act* of Alberta, and/or the Municipal Government Act (MGA) Section 636, for the purpose of receiving public participation in municipal decision-making and scheduling speakers for Council or Council Committee meetings. **Your name and comments will be made publicly available in the Council agenda.** If you have questions regarding the collection and use of your personal information, please contact City Clerk's Legislative Coordinator at 403-268-5861, or City Clerk's Office 700 Macleod Trail S.E., P.O. Box 2100, Postal Station 'M' 8007, Calgary, Alberta, T2P 2M5.

Please note that your name and comments will be made publicly available in the Council agenda. Your e-mail address will not be included in the public record.

I have read and understand the above statement.

ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

The purpose of The City of Calgary is to make life better every day. To fully realize our purpose, we are committed to addressing racism and other forms of discrimination within our programs, policies, and services and eliminating barriers that impact the lives of Indigenous, Racialized, and other marginalized people. It is expected that participants will behave respectfully and treat everyone with dignity and respect to allow for conversations free from bias and prejudice.

I have read and understand the above statement.

First name (required) **Gerry**

Last name (required) **Baxter**

Are you speaking on behalf of a group or Community Association? (required) **Yes**

What is the group that you represent? **Calgary Residential Rental Association**



PUBLIC SUBMISSION FORM

What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

(required - max 75 characters)

9.3.1 Housing and Affordability Task Force Recommendations

Are you in favour or opposition of the issue? (required)

In favour

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below. Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video)
If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

The comments in the attached letter and two documents are in relation to Housing and Affordability Task Force Recommendation # 6c

June 4, 2023

The City of Calgary
800 Macleod Trail SE
Calgary, Alberta T2G 2M3

Attention: Members of Calgary City Council

Re: Housing and Affordability Task Force Recommendations

The Calgary Residential Rental Association (CRRA) represents hundreds of members, including market and non-profit housing providers. We are also long-standing members on the provincial government's *Alberta Residential Tenancy Advisory Committee (ARTAC)*.

We commend the City and the Task Force for looking at ways to increase affordable housing, something that the CRRA supports. We agree more housing is required.

As Council considers "*Recommendation # 6c - To support residents in rental housing experiencing higher than normal increases in rent, investigate rent control models used in other jurisdictions, and provide the Government of Alberta with a summary of the findings*"; we encourage you read the two highly informative documents, "**The Unintended Consequences of Rent Control**" and "**Affordable Housing Solutions**" which are attached.

While it is recognized that rent controls are a Provincial responsibility, we certainly would not like to see the City embark on this course of action, which has a proven history of adversely affecting affordable housing, as shown in the two attached documents.

We also draw to Council's attention that the most affordable and rent-friendly jurisdictions in Canada are in places where there are no price controls (Alberta and Saskatchewan) (*source: rentals.ca*).

We support initiatives that reduce taxes and regulatory barriers to building affordable housing and maintaining these properties.

The CRRA has a history of working collaboratively with the City and the Province. We are willing and able to bring to the table knowledge, experience, and expertise in a variety of areas related to the housing spectrum.

Thank you for your consideration.



Gerry Baxter
Executive Director

The Unintended Consequences of Rent Control

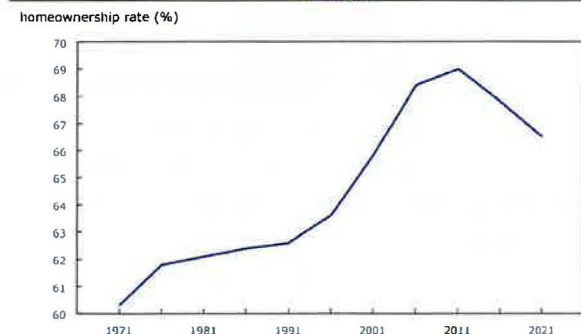
Canadians in virtually all housing markets continue to experience some level of uncertainty regarding affordability due to rising housing costs and limited supply. The fact remains that the most affordable and rent-friendly jurisdictions in Canada are in places where there are no price controls (Alberta and Saskatchewan)¹. Creating affordable, strong, and inclusive communities ensures all Canadians have a broad range of housing options. While rent controls are often first cited as a means to reduce housing costs and may seem like a quick-fix, evidence suggests otherwise.

Canadian Housing At A Glance

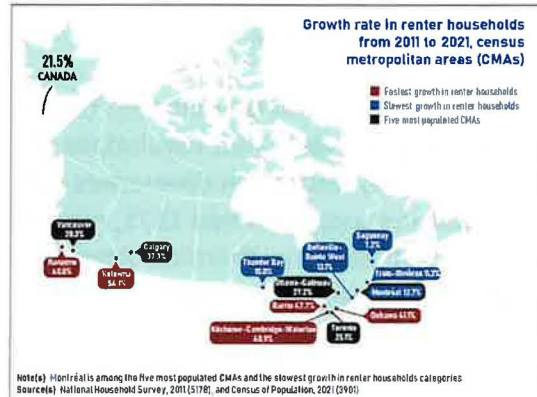
A monthly rental or mortgage payment is one of the biggest expenses for most Canadians. According to The Canadian Mortgage and Housing Corporation (CMHC), an affordable home is one that costs less than 30% of a household's before-tax income.²

With high housing prices, and more recently increasing interest rates, there has been a natural shift in most major centres towards renting. According to 2021 census data, 10 million Canadian households own their home, while five million rent. Statistics Canada revealed that the number of households who rent their homes grew by more than 21 percent between 2011 and 2021.

Chart 1
The homeownership rate in Canada is beginning to decline from its peak in 2011



Note(s): The homeownership rate is the proportion of all households that are owner occupied.
Source(s): Census of Population, 1971 to 2021 (3901), and National Household Survey, 2011 (5178)



Note(s) Montréal is among the five most populated CMAs and the slowest growth in renter households categories.
Source(s) National Household Survey, 2011 (5178), and Census of Population, 2021 (3901)

¹ Rentals.ca, National Rent Rankings, September 2022

² Source: <https://bit.ly/3TnTamU>

Understanding The History of Rent Control in Canada (Ontario - A Case Study)

Let's start at the beginning.

Rent controls emerged for the first time in Canada, in Ontario, in 1944. Their entry was ushered in by the enactment of the National Housing Act; a direct response to a dramatic rise in demand for housing after the Second World War which in turn resulted in sharp increases in market rents.

Rent controls were eliminated a half decade later based on cumulative landlord feedback. However, in the 1970s, tax changes began to discourage developers from investing in new housing stock and rent controls were reintroduced. The impact was two-fold. A slowdown in construction reducing supply and continued demand for rental product led to a rapid increase in market rents for new entrants as in-place residents benefited from rent kept artificially low. This is an all too familiar story for renters in Toronto today.

As a result, the Ontario Government responded by reintroducing stringent rent regulations. This disincentivized new and existing rental construction and resulted in developers halting operations which in turn dramatically reduced rental housing supply. By mid 1975, most mayors were inclined to support the proposal of rent control. The Residential Premises Rent Review Act (1975) was enacted after the demand for rental controls became a major issue in the period leading to the provincial election.

Even though rental construction continued to be depressed, rent control was a favoured populist policy supported by all provincial parties. The Ontario Liberal Government further tightened rent control with the Residential Rent Regulation Act (1985) and in 1992 the New Democratic Party passed the Rent Control Act.

In 2017, rental control only became applied to units that were first built or occupied prior to 1991. In 2018, the provincial Government of Ontario, revised the rent control regulations once again effectively eliminating rent control on new units supplied after November 15, 2018 with unit supplied prior to this date under the restrictions of rent control. This move was made in an effort to encourage investors to build more properties and increase housing supply.



Today, each province and territory has different rent control rules, including frequency limits, increase limits, vacancy decontrol, and how much advance notice is needed ahead of a rent increase.

Lessons Learned: Supply & Demand

A key factor driving up rents in Canada is the shortage of housing supply which brings upon policies that make housing more expensive. Population and income growth have fueled the demand and further exacerbated this shortage to the point that Canadians are now struggling to find not just affordable housing options, but any options at all. According to the CMHC it will take an additional 3.5 million affordable housing units to restore affordability by 2030.

Price limiting mechanisms such as rent controls hinder the balancing effects of traditional supply and demand drivers. Rent controlled apartments and houses, the 'controlled' units, tend to fall below the market-determined growth rate. The longer the units are rent controlled, the further they will fall behind prevailing market rents. With capped revenue growth, the exposure to expense inflation increases the risk to owners and developers which, as evidenced in the 1980s in Ontario, dramatically reduced the delivery of new rental housing stock and negatively impacted affordability for new entrants.

Historical evidence clearly reflects that new supply and competition can create more options at lower, more affordable rents. Controlled returns not only negatively impact new construction, but also contribute to the deterioration of existing stock.

Furthermore, without the appropriate diversity of housing stock, movement through the housing spectrum for those in need of affordable housing, is undermined. In rent regulated markets, those who are already in rent controlled units, regardless of income, are disproportionately advantaged compared to those seeking new rental housing. These units remain under the prescription of rent control and fail to contribute necessary additional capital to build new supply.

The reality is that unregulated housing markets build more. In fact, the average annual completions as a percent of 2016 housing stock in regulated vs unregulated markets was 1.44% vs 2.08%, respectively, and equates to 44% more housing delivered in unregulated markets. Alberta is one of the few jurisdictions to have a balanced supply of affordable options in housing which have been driven by non-controlled investment. According to CIVIDA in 2021, 283,800 households in Canada reported waiting for affordable housing⁴. One of Alberta's

³ Source: <https://www.cmhc-schl.gc.ca/en/blog/2022/canadas-housing-supply-shortage-restoring-affordability-2030#:~:text=To%20restore%20affordability%2C%20an%20additional,for%20everyone%20living%20in%20Canada.>

⁴ <https://civida.ca/wp-content/uploads/2021/11/Exploring-Impacts-of-Affordable-Housing-on-Property-Values-Full-Report-FINAL-1.pdf>

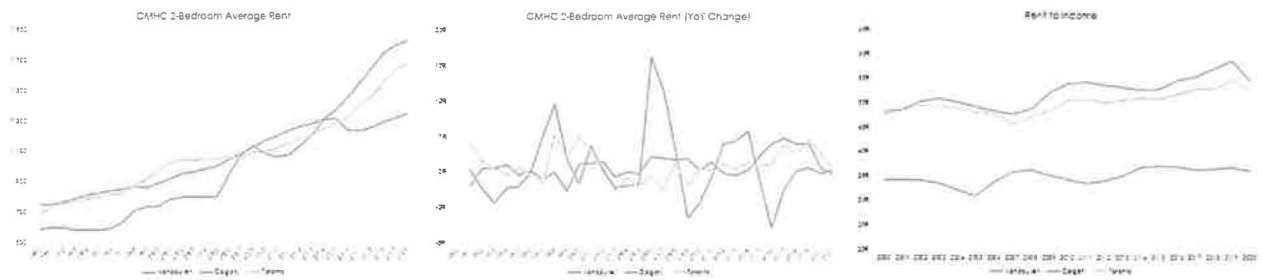
leading multi-housing rental providers, Boardwalk, has confirmed that 90+%⁵ of their Calgary and Edmonton portfolio meets CMHC's 30% affordability threshold.

City	Rent Control	2016 Housing Supply	Completions								% of Housing Supply
			2015	2016	2017	2018	2019	2020	2021	Average	
Fredericton	Yes	42,776	293	501	337	449	418	468	515	426	0.99%
Halifax	Yes	173,460	1,674	2,028	2,380	2,246	2,668	2,776	2,950	2,389	1.38%
Monoton	Yes	61,776	546	1,002	465	948	767	1,055	1,034	831	1.35%
Saint John	Yes	52,876	158	312	172	239	247	478	310	274	0.62%
Abbotsford - Mission	Yes	62,636	613	964	901	1,574	1,303	1,041	1,568	1,123	1.79%
Barrie	Yes	72,535	1,007	957	1,297	1,719	1,015	844	806	1,092	1.51%
Belleville	Yes	43,000	281	434	563	562	656	595	524	515	1.20%
Brantford	Yes	62,630	594	402	430	558	511	828	1,098	632	1.20%
Cape Breton	Yes	43,080	175	180	136	194	157	252	164	180	0.42%
Chatham-Kent	Yes	43,175	126	113	152	159	162	248	432	199	0.46%
Chilliwack	Yes	39,700	573	731	729	983	952	1,064	873	844	2.12%
Greater Sudbury / Grand Sudbury	Yes	70,445	227	359	325	177	205	274	297	266	0.38%
Guelph	Yes	59,260	1,129	916	1,268	1,202	997	796	899	1,014	1.71%
Hamilton	Yes	293,345	2,722	2,075	2,508	2,504	2,541	2,371	3,003	2,618	0.89%
Kamloops	Yes	42,855	528	472	457	605	1,199	725	720	672	1.57%
Kelowna	Yes	81,395	1,118	1,783	1,498	2,351	3,422	2,223	2,140	2,076	2.55%
Kingston	Yes	67,915	644	629	433	641	841	859	575	675	0.99%
Kitchener - Cambridge - Waterloo	Yes	200,495	3,301	4,605	3,531	3,882	2,609	3,634	4,507	3,724	1.86%
London	Yes	206,450	1,837	2,912	2,357	3,713	2,631	3,140	3,815	2,929	1.42%
Montreal	Yes	1,727,310	-	-	20,558	21,650	23,024	24,376	23,222	22,566	1.31%
Nanaimo	Yes	44,960	665	841	766	999	623	1,032	850	825	1.84%
Oshawa	Yes	138,960	1,362	1,903	2,479	2,233	2,149	2,465	2,489	2,154	1.55%
Ottawa	Yes	373,755	-	-	5,394	6,845	5,936	7,767	8,635	6,919	1.85%
Peterborough	Yes	50,535	331	330	492	315	551	347	495	409	0.81%
Quebec	Yes	361,890	4,354	4,915	5,017	5,709	5,750	5,605	7,017	5,481	1.51%
Saguenay	Yes	72,480	552	438	411	439	375	478	610	472	0.65%
Sarnia	Yes	41,980	176	206	246	195	214	184	274	214	0.51%
Sherbrooke	Yes	95,580	1,524	955	1,589	1,214	1,194	1,950	2,194	1,517	1.59%
St. Catharines - Niagara	Yes	169,485	1,378	1,577	2,057	2,023	1,413	2,666	2,314	1,934	1.15%
Thunder Bay	Yes	52,545	329	248	167	205	225	180	151	215	0.41%
Toronto	Yes	2,135,910	46,384	34,513	37,132	37,750	27,410	30,841	36,723	35,836	1.68%
Trois-Rivieres	Yes	72,505	760	555	583	781	737	734	406	651	0.90%
Vancouver	Yes	960,895	17,346	18,148	21,806	24,555	22,603	24,039	25,229	21,961	2.29%
Victoria	Yes	162,735	1,765	1,787	2,526	2,668	3,626	4,044	3,907	2,903	1.78%
Windsor	Yes	132,920	828	1,074	1,314	1,029	868	1,391	1,069	1,081	0.81%
Winnipeg	Yes	306,550	4,182	4,594	4,337	4,845	4,345	4,853	4,833	4,566	1.48%
Calgary	Yes	518,695	14,543	13,239	11,014	9,732	11,134	10,705	10,774	11,582	2.23%
Edmonton	Yes	502,140	16,530	15,123	10,753	10,091	10,384	11,363	11,277	12,217	2.43%
Lethbridge	Yes	45,695	624	907	672	712	671	498	592	668	1.46%
Red Deer	Yes	39,980	762	419	320	221	448	111	193	353	0.88%
Regina	Yes	94,955	2,343	1,796	1,590	2,050	941	618	871	1,457	1.53%
Saskatoon	Yes	115,280	2,663	2,854	2,053	1,568	1,563	1,461	2,190	2,065	1.79%
St. John's	Yes	85,015	1,311	1,087	751	759	532	466	484	770	0.91%
Rent Control		8,609,715	99,583	93,559	126,811	138,261	124,335	137,031	146,648	123,747	1.44%
No Rent Control		1,462,760	38,776	35,525	27,143	25,133	25,673	25,222	26,381	29,122	2.08%

Fact vs. Fiction: The Truth About Affordability in Unregulated Markets

Rent controls have failed to prevent rents from increasing and have failed to provide more affordable rental housing. Based on the charts below we see the proportionality between rent growth and income. Proponents of rent control may be quick to argue that unregulated markets experience periods of high rent increases with big increases to nominal rents. However, upon closer examination, the data reveals that the cumulative effects of market rents in unregulated markets over time make them truly affordable. In addition, unregulated markets tend to have more affordable rents relative to incomes.

⁵ Taken from Boardwalk's LinkedIn post: <https://www.linkedin.com/company/boardwalk-reit/posts/?feedView=all>



Alternatives to Rent Control

Alberta in particular has had its fair share of historical affordability challenges: namely, a cyclical resource-based economy, strong population growth, and rising construction costs, to name but a few. Government's role is clear--by diversifying our economy, keeping taxes low, and supporting open market development and enterprise, the multi-family residential market will continue to flourish and best respond to these affordability challenges, providing the necessary housing to build strong communities for all Canadians.

In the end, there are better ways to protect renters. A quicker resolve, without stifling new construction, would be by way of rent supplements/subsidies given to those vetted for proven need. Furthermore, government could assist by directing the flow of immigration to markets that have a better balance of housing supply. When new supply is brought online, prices would decrease and supplements would cease. This leads to another alternative, incentivizing new housing construction by prioritizing approvals, reducing upfront permitting costs and tax surcharges in exchange for a commitment to maintain affordable rental rates. Lastly, to create supportive financing and funding to make building and preserving affordable housing more attractive. A reduction in the cost of capital will help to create the much needed new supply of affordable housing communities.

Conclusion

The economic and social factors highlight that short-term rent abatement does not result in affordable rents nor provides long-term solutions for Canadians looking for housing. We need to work together, with an all hands on deck approach, to create sustainable housing opportunities for all of our communities in Canada.

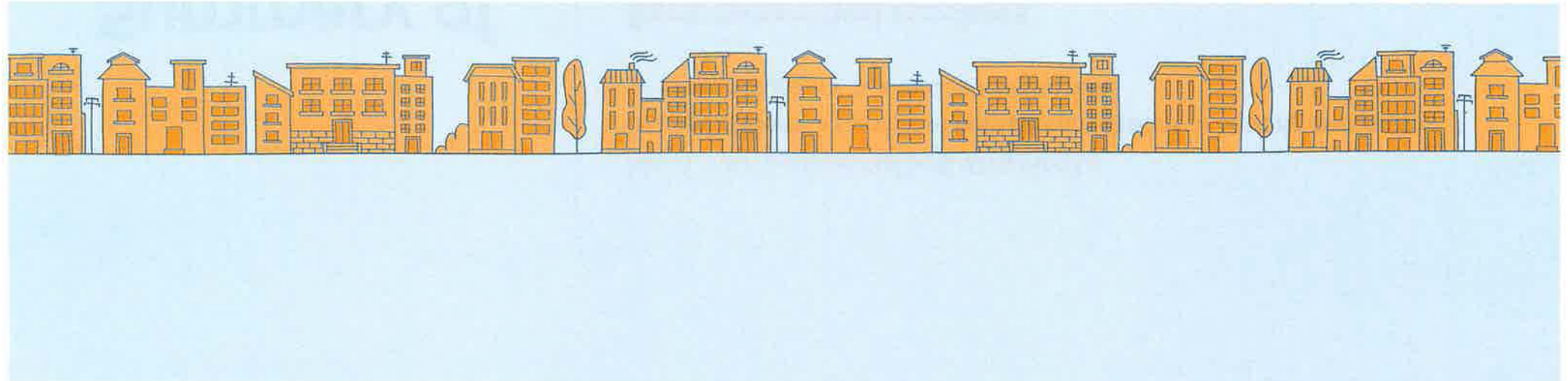
Alberta has not seen rent control in over forty years yet continues to boasts a very high level of investment in new supply, resulting in competition that has lead to the some of the most affordable pricing in our country. Free markets remain the best providers of affordable housing. Government policies and regulations that reduce taxes and capital costs, and provide targeted rent supports for those who need it are all tried, tested, and proven ways to help increase affordable housing for all Canadians.

The economic contribution of our industry is noteworthy: \$70B in GDP, \$26B in tax revenue, and 450K related jobs⁶. These are the direct benefits of a free market that, if interrupted without careful consideration, can impact our economy and all those who wish to have an affordable, safe, and well-managed, place to call home.

⁶ Deloitte Report (2016), *Potential Implications of Bill 202 policies to the Residential Market in Alberta*

MARCH 2023

Affordable Housing Solutions



Summary of Current State

Non-rent controlled markets

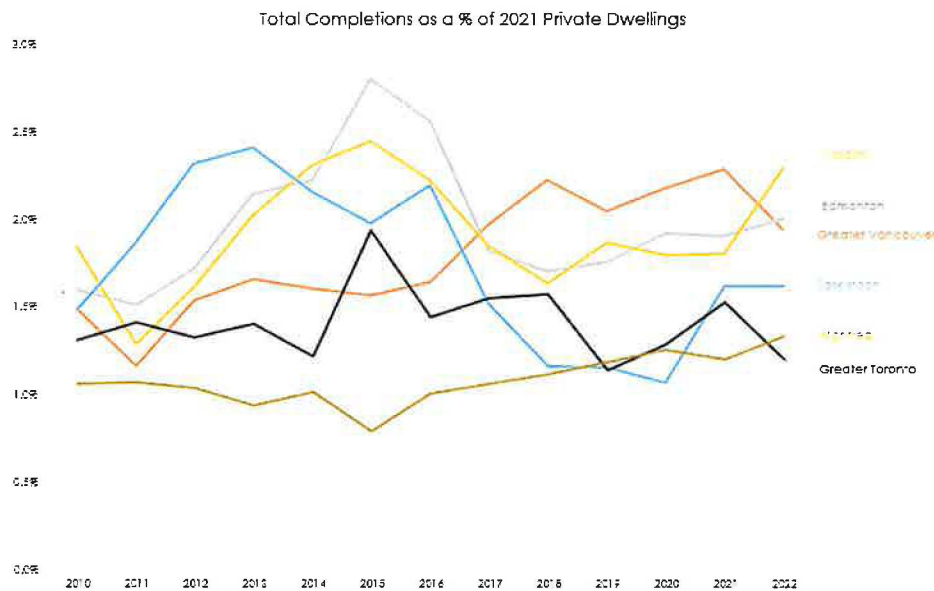
Less regulations > significant housing completions > housing over supply
> lower occupancy > affordable rental rates

Rent controlled markets

More regulations > less housing completions > housing supply shortage
> high occupancy > high rental rates

Total Housing Units Built Each Year

Scaled for the 2021 census housing stock



Key Message:

New housing supply is the highest in non-rent controlled markets.

Additions to housing supply each year on average (2010-2022):

Edmonton = 2.0%

Calgary = 1.9%

Greater Vancouver = 1.8%

Saskatoon = 1.7%

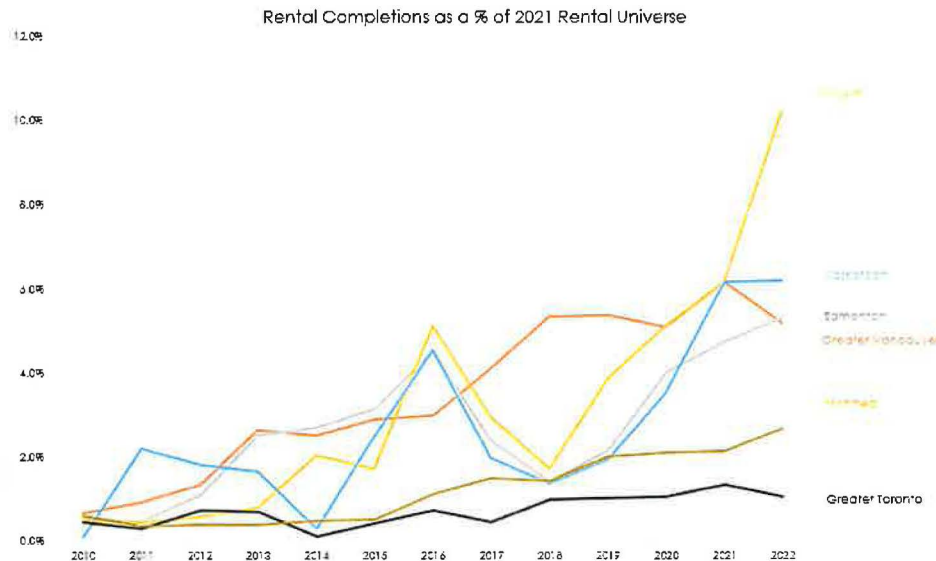
Greater Toronto = 1.4%

Montreal = 1.1%

Sources: CMHC Starts and Completions by Intended Market by Cities

Total Rental Housing Units Built Each Year

Scaled for the existing number of rental apartments in 2021



Key Message:

Non-rent controlled markets have significantly more new relative rental supply.

In addition to the large volume of rental deliveries in 2022, as at December 2022, there were ~6,600 rental units under construction in Calgary.

Edmonton = 2.7%

Calgary = 3.2%

Greater Vancouver = 3.5%

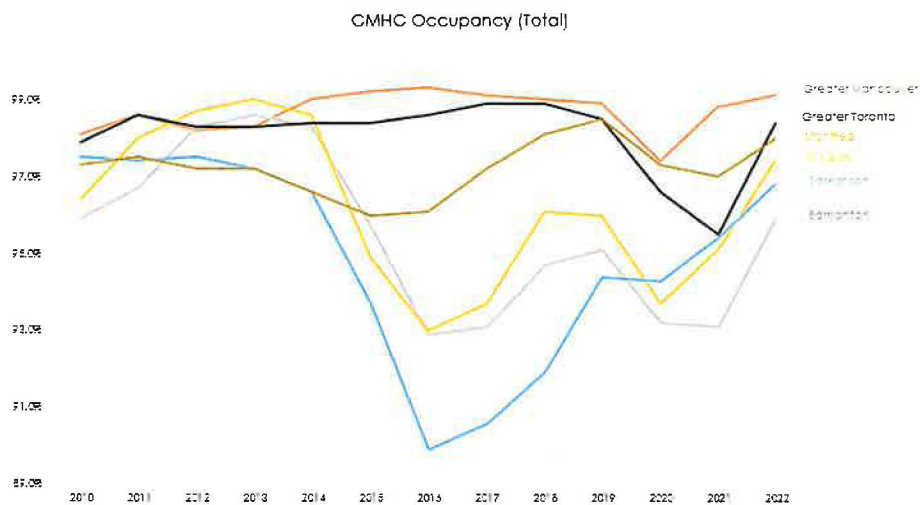
Saskatoon = 2.6%

Greater Toronto = 0.7%

Montreal = 1.2%

Sources: CMHC Starts and Completions by Intended Market by Cities

CMHC Rental Market Survey History of Occupancy



Key Message:

Non rent-controlled markets have the highest vacancy as a result of more supply.

Calgary, Edmonton and Saskatoon markets saw significant housing completions in 2014-2019

Average occupancy (2010-2022):

Edmonton = 95.5%

Calgary = 96.2%

Greater Vancouver = 98.7%

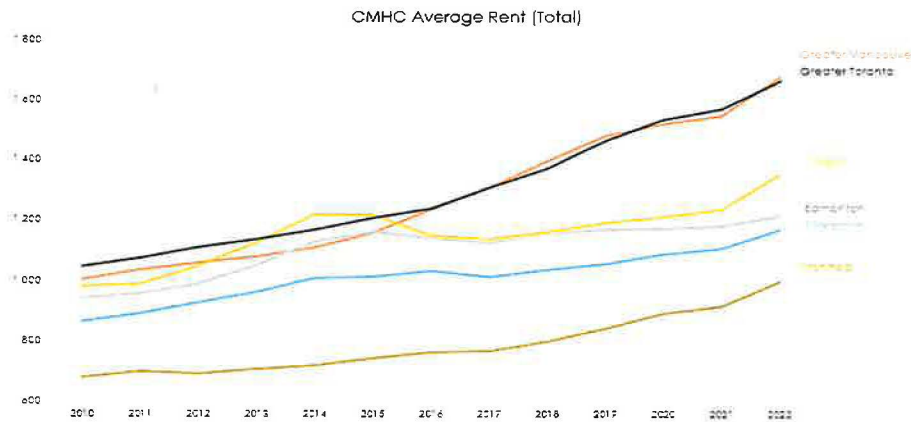
Saskatoon = 94.9%

Greater Toronto = 98.1%

Montreal = 97.2%

Sources: CMHC 2021 Rental Market Survey

CMHC Rental Market Survey History of Average Rent



Key Message:

Rent-controlled markets have the highest rents, reducing choice and optionality for renters.

In areas with rent control, CMHC's average rent does not represent current price to rent an apartment.

Ex: Cost of finding an apartment to rent in Vancouver is around \$3707/month, per rentals.ca (Oct 2022), not \$1675/per CMHC (Oct 2022)

Current CMHC Average Rent:

Edmonton = \$1,215

Calgary = \$1,351

Greater Vancouver = \$1,675

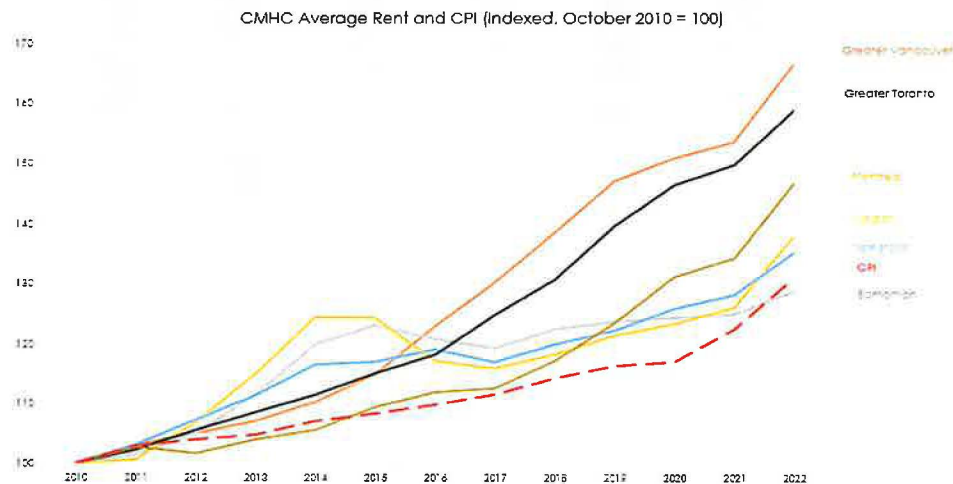
Saskatoon = \$1,167

Greater Toronto = \$1,665

Montreal = \$998

Sources: CMHC 2021 Rental Market Survey

CMHC Average Rent Relative to Consumer Pricing Index (CPI)



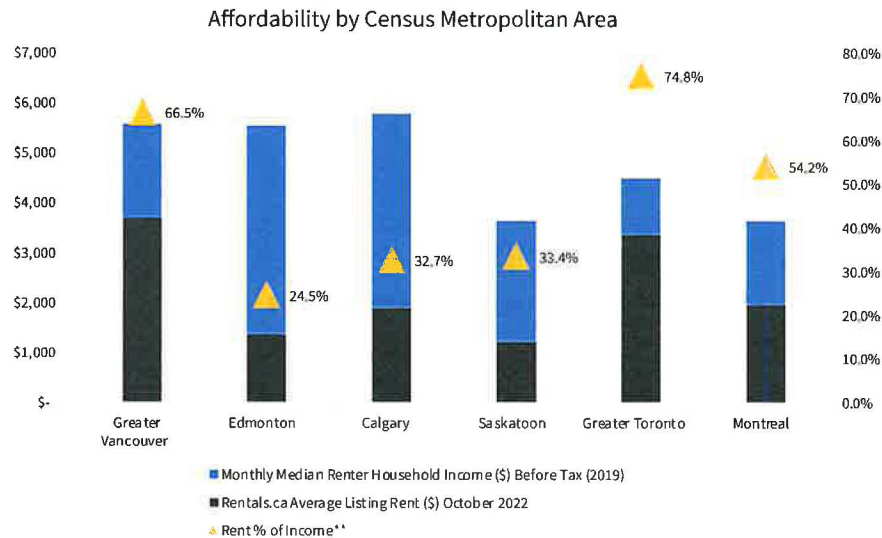
Key Message:

Average rent pricing in rent-controlled markets have outpaced CPI (inflation).

Ex: Vancouver average rent has grown by ~65% and CPI has grown by 30% over 12 years.

Sources: CMHC 2021 Rental Market Survey,
Statistics Canada Table 18-10-0004-01

Affordability Relative to Market Rent



Key Message:

Residents in rent controlled markets spend significantly more of their income on rental housing.

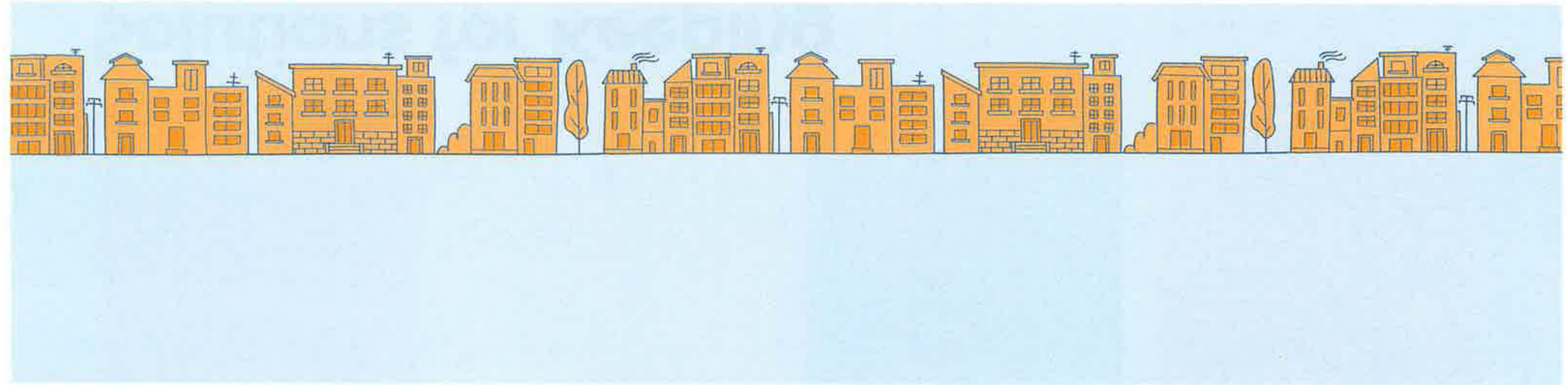
CMHC defines affordable rent as 30% of the 2019 median renter household income before tax.

Renter households in Vancouver, Toronto, and Montreal are paying significantly more than 30% of pre-tax income on rent.

Sources: Rentals.ca October 2022 rent report, Canadian Income Survey 2012-2019 adapted by CMHC
 ** Comparing 2019 median renter household incomes to 2022 Average listing rents skews the Rent % of Income upwards. 2019 is the most recent renter household specific income data.



Solutions for Keeping Housing Affordable



Solutions for Keeping Housing Affordable



**Market Pricing on
Rental Apartments**



Limit Taxation




Capital Grants



Rent Supplements

Market Pricing on Rental Apartments




Non-rent controlled market = better outcomes in both construction and rental affordability



Price controls = supply destruction + housing shortages + discourages new development



Market solutions = increased competition + choice + supply



Increased competition, demonstrated by Calgary & Edmonton's out-sized construction



Taxation Policy

01

Increasing the CCA Allowance (1950-1980) to incentivize building rental housing

Property tax mill-rate equity between single family and multi-residential to incentivize building rental housing.

02

Edmonton municipality has recently approved and adopted property tax mill-rate equity to encourage more affordable rental housing development.

03

Example of property tax exemption programs: Regina Housing Incentives Policy. Market rental that received building permits between 2015 and 2017 received a property tax exemption. Number of rental units constructed/completed in Regina hit a 30-year high in 2018



Capital Grants

01

Capital grants were successfully implemented in Alberta in 2010 to help lower the cost of building affordable housing

Example: Calgary buildings pictured above (Kaleidoscope, Victoria Gardens, Spruce Ridge Gardens):

02

Commitment to keeping rent affordable for 20 or 30 years with no option to buy out of the commitment.

03

Support opportunities for not-for-profits to buy and operate affordable housing.

- Able to secure volume of affordable units when buying older, existing, stock when compared to building new.
- Not-for-profits able to acquire affordable housing for below replacement cost.

04

Government as a partner in maintaining and building upon supply of affordable housing.

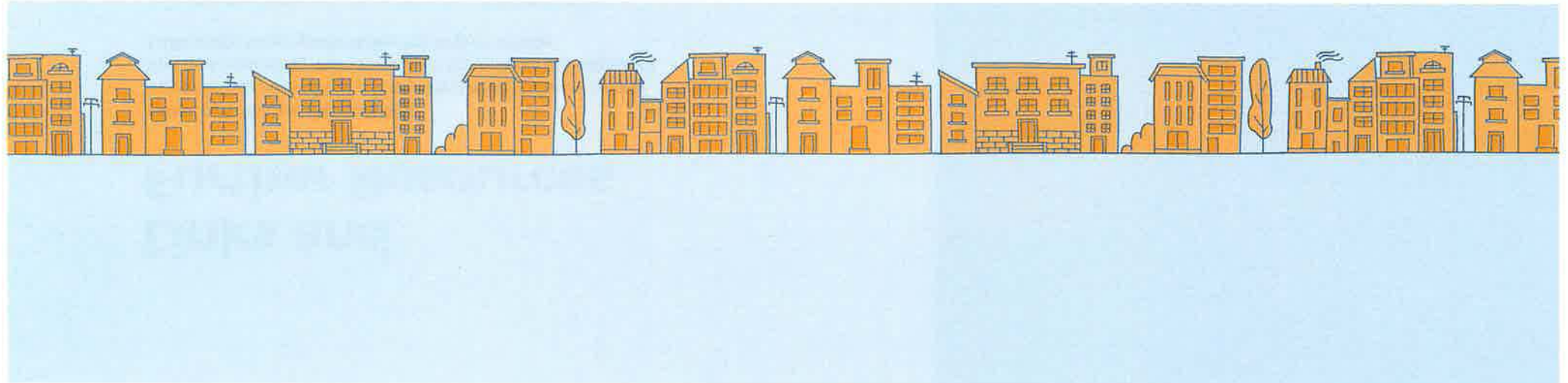
Rent Supplements

Although on an aggregate basis, renting in Alberta is generally affordable, having a social safety net for families with lower incomes helps alleviate homelessness.

Allows for immediate support to those most in need.

Lowers financial barrier of entry, increases choices and competition for renters.

Appendices



Links and Further Resources

CMHC Definition of Affordability:

<https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>

Canadian Rental Housing Providers for Affordable Housing:

<https://foraffordable.ca/>

REALPAC Pathways to Better and More Housing

<https://realpac.ca/morehousing/>

Alberta Affordable Housing Review Panel and Report

<https://www.alberta.ca/affordable-housing-review-panel.aspx>

CMHC Rental Market and Construction Data Portal:

<https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Rental>

Regina Property Tax Incentive for Rental:

<https://www.regina.ca/export/sites/Regina.ca/home-property/housing/.galleries/pdfs/Housing-Incentives-Policy.pdf>



Existing Housing Stock and Rental Universe

Toronto and Montreal are the largest housing markets in terms of total households (private dwellings) and rental universe. Montreal and Edmonton have the highest proportion of rental housing.

Vancouver, Toronto, and Montreal are subject to varying degrees of rent control.

Edmonton, Calgary, and Saskatoon do not have rent control.

Construction data analyzed are either scaled by the number of private dwellings (number of households) or the rental universe (number of rental apartments).

Scaling construction by existing supply controls for differences in city size and ensures the comparison is apples-to-apples

	Private Dwellings (CMA) 2021 Census	Rental Universe 2021 CMHC RMS	Rental % of Total Housing
Vancouver	1,104,532	117,168	10.6%
Edmonton	589,554	84,621	14.4%
Calgary	594,513	49,037	8.2%
Saskatoon	134,720	16,123	12.0%
Toronto	2,394,205	327,970	13.7%
Montreal	1,929,263	614,097	31.8%

Sources: 2021 Census, CMHC 2021 Rental Market Survey
Per CMHC, data excludes any rental units provided in secondary rental market



June 2nd, 2023

The City of Calgary
P.O. Box 2100, Station M
Calgary, AB T2P 2M5

Attention: Members of Council

Ladies and Gentlemen:

Re: May 4, 2023, Housing and Affordability Task Force Recommendations

BILD Calgary Region (BILD) supports housing for all, particularly the safety and dignity that a home, whether it be owned or rented, provides for citizens. Our members have a strong history for supporting the whole continuum of housing supply. The Resolve Campaign was spearheaded by Industry and continues to deliver to Calgary's affordable housing supply. This is in addition to the strong response as outlined herein of BILD members to market priced housing demand, which also helps in our collective quest for housing affordability for all. Examples of BILD members' contributions to affordable non-market housing is attached to this letter.

BILD believes that housing affordability needs to be tackled across the full housing continuum. In the November 28, 2022 report, [Governments alone cannot fix Canada's housing affordability challenges](#), by the Canada Mortgage and Housing Corporation (CMHC) Deputy Chief Economist Aled ab Iorwerth, states rent subsidies and more social housing are helpful but more needs to be done across the entire spectrum and the private sector needs to be involved. The report emphasises there must also be increased supply of housing aimed at the market. "... to overcome these affordability challenges, we need a range of government policies and investments stemming from several sources, notably the private and public sectors. The scale of the challenge is so large that the private sector must be involved – governments cannot do this on their own ... The interconnectedness of housing means that both tracks must be pursued ... Governments must take a system-wide view and not encourage housing supply for low-income households by discouraging housing supply for middle-income households."

BILD has reviewed the Housing Affordability Task Force recommendations and the associated actions. BILD and its members agree with many of the recommendations and actions. We provide this letter of support toward taking constructive action on housing affordability and propose further recommendations which we urge Council to incorporate into an overall plan to address and improve housing affordability in Calgary.

Current Status:

In [RBC's March 2023, Housing Trends and Affordability Report](#), Calgary's market-priced affordability ranks second most affordable amongst major Canadian metropolitan centers and better than the Canadian average shown. However, the share of income a household needs to cover ownership costs for Calgary is 43.2%. This is above both the long-term average for Calgary (38.8%) and the level of household before tax income, 30%, which the CMHC considers as affordable.

According to a study commissioned by [UDI Edmonton, Housing Everyone - Impacts of Increasing Costs to Housing Affordability](#), "An increase of \$10,000 to the purchase price of an entry level home prices 7,591 households out of the market." As outlined in our further recommendations, all reasonable efforts should be made to minimize the cost to bring on additional housing supply.

In the [April 2023 Housing Supply Report](#), the CMHC shared the positive news, "... Calgary hit a record in 2022, with 17,306 housing starts, slightly outpacing the previous record seen in 2014." This news underscores Industry's willingness and ability to respond to demand. The balance in Calgary housing supply starts in 2022 (see Table 1 on page 22 in the report), was also noted by the CMHC, "This was the second year in a row where housing starts increased across all dwelling types."

The CMHC goes on to comment, "Purpose-built rental apartments also accounted for a sizable share (45%) of total apartment starts in 2022. In fact, based on data going back to 1990, rental starts were at the highest level on record (3,505 starts) over the past year. The number of units under construction was also at a record high (6,500 units)."

The CMHC's final comments in respect of Calgary are, "The outlook for the Calgary area has improved significantly over the past year. Consequently, any new ways to create additional housing supply for the growing population will be of great importance."

Calgary's overall housing starts remain strong into 2023. [CMHC's 2023 April Monthly Housing Starts](#) (Click "View Highlights" for interactive tables) show year over year growth. BILD members are also reporting a strong start to the year and expect this trend to continue throughout 2023.

Going forward—supply is the key to unlocking affordability

[Chapter 1 of Federal Budget 2022](#) made clear, "There are a number of factors that are making housing more expensive, but the biggest issue is supply."

The urgency to facilitate more housing supply was highlighted by the CMHC in its [June 2022, Canada's Housing Supply Shortages: Estimating what is needed to solve Canada's housing affordability crisis by 2030 report](#):

- "We anticipate that Canada will need an additional 3.5 million units to restore housing affordability beyond current projections [by 2030]"
- "That means [a total inventory of] over 22 million housing units will be required by 2030 to help achieve housing affordability for everyone living in Canada. Delivering more housing supply, beyond predicted growth in the number of households, will enable better matching of households with the housing they want."
- "... Canada's approach to housing supply needs to be rethought and done differently. There must be a drastic transformation of the housing sector, including government policies and processes, and an 'all-hands-on-deck' approach to increasing the supply of housing to meet demand."—Aled ab Iorwerth, Deputy Chief Economist, CMHC
- "There have been a multitude of reports on Canada's housing system over the last few years. Government panels have been struck and the answer is now clear: we need more housing supply. We need to take drastic measures now to produce more housing—not more reports," is a supporting call to immediate action.

The importance of increasing housing supply will be even greater as Canada seeks to attract more immigrants. The federal government has ambitious immigration targets as outlined in their immigration policy, [2023–2025 Immigration Levels Plan](#). "Canada aims to welcome from 410,000 to 505,000 new permanent residents in 2023, from 430,000 to 542,000 in 2024, and 442,500 to 550,000 in 2025." While this will almost certainly bring more skilled and experienced labour resources to assist in addressing the labour force requirements to add housing supply, it will also increase demand for all forms of housing supply.

In that respect, Industry agrees Recommendations 1 and 2 from the Housing and Affordability Task Force are on target:

- Recommendation 1: **Make it easier to build housing across the city.**
- Recommendation 2: **Make more land available to build more housing across the city.**

Industry urges Council to direct that Administration ensure these two key recommendations apply across the full continuum of both market housing and non-market housing.

Focusing on those two recommendations as key guidance will serve existing and future Calgarians by addressing housing affordability across the full spectrum of housing in Calgary. To the Administration's credit, examples of constructive collaboration with industry is already underway on initiatives which include Balancing Policy for Mutual Success and the new process for Growth Applications within New Communities. Industry agrees provision of non-market housing is a fundamental need. However, failure to address demand for market-priced housing or adding time and costs to the market-priced development and housing processes will drive the need for non-market housing higher and exacerbate affordability issues.

BILD's Additional Recommendations:

BILD congratulates the Housing and Affordability Task Force on the work so far on housing affordability. In addition to the actions the Task Force proposed, Industry offers and encourages additional important actions and recommendations (see full details attached) which, with Council support and direction, will serve housing affordability in Calgary:

1. Costs of the strategy must be neutral or better
2. Increase the number of fully serviced lots
3. Labour supply
4. Federal Advocacy
5. Monitoring and reporting
6. Planning and development policy
7. Recognize the constrained capacity of existing infrastructure in established areas
8. Continue to recognize and celebrate Calgary's successes

BILD's members are not simply financially invested in Calgary, with so many of them being long-term citizens, they are personally invested in Calgary's success and all aspects of our community's well-being, including affordability. BILD urges Council to press forward on this critical matter for our community by adopting and incorporating BILD's additional recommendations.

We would be pleased to meet with Council or the Task Force to discuss these matters further. Should you have any further questions, or should the Task Force or Administration wish to further engage with BILD on these matters, please contact the undersigned.

Yours truly,



Brian R. Hahn
CEO, BILD Calgary Region

Cc: Stuart Dalgleish, GM Planning and Development Services
Tim Ward, Manager, Housing Solutions
Josh White, Director, Calgary Approvals Coordination Planning & Development
Debra Hamilton, Director, Community Planning
Melanie Hulsker, Director, Community Strategies
Jeff Chase, Director, Partnerships
BILD Calgary Region Board of Directors

Attachments

[Habitat for Humanity, Avalon Master Builder partner on 24-unit Livingston project](#)

[Attainable Homes – Our Current Builder Partners](#)

[Bridlewood Affordable Housing](#)

[Calgary Home Builders Support Affordable Housing Big Time!](#)

[Alberta, CMHC Investing \\$54M to Build 17 Affordable Housing Projects](#)

[Eighth permanent supportive housing development through Resolve Campaign unveiled in Hillhurst](#)

[Resolve campaign a huge success](#)

[Aurora on the Park](#)

[Calgary Homebuilders Honoured](#)

[Sunsetting Calgary's 10 Year Plan to End Homelessness: Learnings from a Decade of Progress & What's Next](#)

[Resolve Campaign](#)

[The Resolve Initiative Continues To Provide Safe Housing For Calgary's Homeless – A Look Back At The Impacts of Qualico's Donation](#)

[Resolve YYC](#)

[Morrison Builds for Those in Need](#)

[New affordable housing development opens in downtown Calgary](#)

1. **Costs of the strategy must be neutral or better**—additional costs, whether supported by the MII rate or other means, run contrary to the primary aim of the Task Force—affordability. There are several recommendations where the Financial Impact is denoted with “\$\$\$”. Prioritize zero added cost items; adding costs or shifting costs, which are not otherwise offset with savings, will end up in household expenses and not improve affordability. Industry specifically cautions against adopting any uncompensated developer requirements for non-market housing in any Local Area Plan. Any such requirements will simply drive the cost of market housing up and increase the need for non-market housing. Non-market affordable housing is a societal issue – should additional costs be incurred to address non-market housing, those costs should be fairly shared across all taxpayers not added to the cost of new housing.
2. **Increase the number of fully serviced lots**—show support to the Task Force’s Recommendation 2, by increasing the number of fully serviced lots by way of timely utility construction. To support this, Council, as sole shareholders of ENMAX, should adopt a Calgary-first approach in terms of prioritizing ENMAX’s investments in infrastructure for growth, which support increases in all forms of housing supply, as well as investments in infrastructure which advance the safety and reliability of electric utility service for Calgarians.
3. **Labour supply**—there are many pressures on housing cost and constraining supply. Both accredited and unaccredited labour supply are vital and indispensable to address the demand for housing affordability and availability. Provide support to focused immigration and housing policy by advocating for increases to skilled and experienced worker immigration and federal acceptance of appropriate level of Alberta nomination certificates.
4. **Federal Advocacy**—there are several provincial government asks but few recommended federal government asks. We encourage Council to direct federal advocacy as follows:
 - Remove barriers to homeownership for first-time buyers by fixing the stress test; avoid more mortgage rule tightening; reintroduce 30-year amortizations for CMHC insured mortgages. Any added risk from this change is low and is appropriate given Canada’s very low default rates on mortgages.
 - Lower government-imposed costs that add to affordability challenges: Fix GST Rebate thresholds; fix taxation on purpose-built rentals.
 - Address labour shortages; increase skilled worker immigration; support skilled workers.
 - Support increased productivity; Support modular and factory-built construction.
 - Avoid adding costs through building codes and related regulations. For example, climate policies that require more energy efficient construction or retrofitting should be as cost neutral as possible by providing efficient financing for clean energy improvements and encouraging efficiency standards (e.g., enerPHit) whereby utility savings offset the financed cost of improvements. Ensure affordability is a core building code objective; innovation before regulation.
5. **Monitoring and reporting**—direct regular reporting to Council and Council Committee on the adopted action plan, including:
 - Affordability metrics like those included in the RBC Housing Trends and Affordability Report. The Task Force has recommended “Increase and diversify the supply of housing. Boost development by 1,000 more market homes beyond what is normally built in a year, and at least 3,000 non-market affordable homes a year.” Industry accepts the Task Force recommendation regarding the target number of additional non-market affordable homes per year as having been researched and deemed appropriate. However, BILD believes an arbitrary target of 1000 additional market homes per year may be insufficient to improve or maintain affordability.
 - Respectively, additions to fully serviced market and non-market lots.
 - Assessment of the cumulative reductions in policy/red tape for both market and non-market housing against any added policy.

- The cumulative costs of the plan and the tangible cumulative offsets to those costs in an effort to demonstrate achievement of overall affordability.
- 6. Planning and development policy**—Avoid reigniting the community opposition which emerged as part of the process which resulted in the Guide to Local Area Planning with blanket, pan-Calgary approaches to local area planning. Direct Administration to continue to work with communities which welcome redevelopment and added density. Developers and redevelopers want to be part of processes which continue to build communities up, not tear communities apart. The current welcoming community approach Industry understands Administration is taking is strongly preferred.
- 7. Recognize the constrained capacity of existing infrastructure in established areas**—where redevelopment and increased density is welcomed by the community, direct Administration to leverage life-cycle replacement investments in infrastructure like water distribution lines, wastewater collection trunks and storm drainage infrastructure, to minimize the cost of redevelopment. Adding or shifting costs, which end up in redevelopment or other fees, adds to an already complex and costly redevelopment process. Direct Administration to leverage both the opportunity of life-cycle replacement as well as the accretive revenues and fees from redevelopment and intensification to support City investment in needed capacity upgrades and affordability.
- 8. Continue to recognize and celebrate Calgary’s successes**—contrary to the narrative advanced by many, Calgary is one of the most compact major metropolitan areas in Canada with:
- According to [Statistics Canada](#), the fourth highest downtown population density—ranking only behind, Vancouver, Toronto, and Montreal and notably ahead of Ottawa, Hamilton, Winnipeg, Victoria, Edmonton, Kelowna, Saskatoon, Regina, and Kamloops.
 - While the reference is dated, in [2014, Maclean's magazine](#) postulated, “Considering each City’s current density, how big would Canada’s major centres be if the nation’s entire population moved in?” Of the cities shown on the Maclean’s map (Montreal was not shown), Calgary ranked 4th behind Vancouver, Toronto, and Winnipeg.
 - In respect of the foregoing, the superior affordability of Calgary housing when compared to Vancouver, Toronto, and Montreal.



The City of Calgary
800 McLeod Trail SE
Calgary, AB T2G 5E6

RE: Housing and Affordability Task Force Recommendations

The Calgary Student Alliance is a non-partisan organization made up of post-secondary student association in Calgary. The CSA represents over 90,000 students to the municipal government. On behalf of the Calgary Student Alliance (CSA), we would like to share our strong support for the Housing and Affordability Task Force Recommendations.

Obtaining affordable housing is a significant challenge for many students, and efforts, like these recommendations, must be put in place to ensure that students, and all Calgarians, have a safe and affordable place to call home.

Students are entering a second consecutive year where on-campus residence buildings at the University of Calgary are completely full. As a result, many students are struggling to find housing that is both affordable and within reasonable proximity to the university.

In addition, new university developments like the University District remain largely unaffordable for students, leaving students amid a housing crisis with dwindling options. The drastic rise in prices near post-secondary institutions is also making it extremely difficult to find affordable dwellings in proximity to campuses, forcing many students to obtain housing further away.

The affordability of housing is an issue for students from across Calgary. We can all agree that students should be able to live in close proximity to where they spend most of their time. Instead, lengthy commutes to and from campus are more and more the rule rather than the exception.

The cost of housing is a growing concern for many students who are currently struggling to pay their tuition along with basics like food and other essentials. Implementing recommendations such as these which incentivize new development and work to promote densification need to be made a priority to overcome these challenges.

Implementing these recommendations will also help to better protect vulnerable individuals from unsafe living situations. Fostering communities which prioritize affordable housing options and create more housing opportunities for students and Calgarians alike will allow folks to participate and engage in our beautiful city.

In particular, including in the MDP that every LAP should enable a minimum of 15% of total housing be non-market housing will help provide equal distribution of affordable units across the city, rather than concentrate them in certain areas. A further recommendation to enable diverse housing types will help address the issue of missing middle housing in our communities.

The Students' Union, The University of Calgary

251 MacEwan Student Centre, 2500 University Drive NW, Calgary, Alberta T2N 1N4

Phone: (403) 220-6551 Fax: (403) 284-1653 www.su.ucalgary.ca

Many students live in secondary suites. An incentive program leading to at least 400 new units annually means greater housing supply for students and all Calgarians.

Furthermore, many students end up in unsafe housing due to the low vacancy rate and lack of affordable options. Students, especially international, are generally unaware of their rights as tenants and may fear retribution from a landlord should they complain. In addition to raising this awareness through a service similar to Edmonton's Supports for Tenants, tenants should be protected from such retribution.

These recommendations will increase the vibrancy of our communities. Students want to live close to their campus but are finding this more and more difficult. Creating walkable neighborhoods in proximity to campuses is an important step to create student connections to community. It is also a factor for students once they graduate when they determine whether they will stay in Calgary or go elsewhere.

It is a privilege to provide our support for the recommendations proposed by the Housing and Affordability Task Force which will work to promote more accessible, safe, and affordable housing in Calgary for students.

We implore City Council to support these recommendations and ensure housing options and affordability across our city.

Sincerely,

Members of the Calgary Student Alliance

University of Calgary Students' Union (UCSU) President Shaziah Jinnah-Morsette
University of Calgary Students' Union (UCSU) Vice President External Mateusz Salmassi

Students' Association of Mount Royal University (SAMRU) President Joseph Nguyen
Students' Association of Mount Royal University (SAMRU) Vice President External Prabhjit Grewal

Southern Alberta Institute of Technology Students' Association (SAITSA) President Aaron Ramos

University of Lethbridge Students' Union (ULSU) Vice President External Rachele Preston

University of Calgary Graduate Students' Association (UCGSA) President James Steele
University of Calgary Graduate Students' Association (UCGSA) Vice President External A.C. Cameron



PUBLIC SUBMISSION FORM

Please use this form to send your comments relating to an upcoming Council or Committee matter, or to request to speak on an upcoming public hearing item.

In accordance with sections 43 through 45 of [Procedure Bylaw 35M2017](#), the information provided may be included in the written record for Council and Council Committee meetings which are publicly available through www.calgary.ca/ph. Comments that are disrespectful or do not contain required information may not be included.

FREEDOM OF INFORMATION AND PROTECTION OF PRIVACY ACT

Personal information provided in submissions relating to matters before Council or Council Committees is collected under the authority of Bylaw 35M2017 and Section 33(c) of the *Freedom of Information and Protection of Privacy (FOIP) Act* of Alberta and/or the Municipal Government Act (MGA) Section 636, for the purpose of receiving public participation in municipal decision-making and scheduling speakers for Council or Council Committee meetings. **Your name and comments will be made publicly available in the Council agenda.** If you have questions regarding the collection and use of your personal information, please contact City Clerk's Legislative Coordinator at 403-268-5861 or City Clerk's Office, 700 Macleod Trail S.E., P.O. Box 2100, Postal Station 'M' 8007, Calgary, Alberta, T2P 2M5.

Please note that your name and comments will be made publicly available in the Council agenda. Your e-mail address will not be included in the public record.

I have read and understand the above statement.

ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

The purpose of The City of Calgary is to make life better every day. To fully realize our purpose, we are committed to addressing racism and other forms of discrimination within our programs, policies, and services and eliminating barriers that impact the lives of Indigenous, Racialized, and other marginalized people. It is expected that participants will behave respectfully and treat everyone with dignity and respect to allow for conversations free from bias and prejudice.

I have read and understand the above statement.

First name (required) **Isabelle**

Last name (required) **Jankovic**

Are you speaking on behalf of a group or Community Association? (required) **No**

What is the group that you represent?



PUBLIC SUBMISSION FORM

What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

(required - max 75 characters)

Item 9.3.1: C2023-0415 Housing and Affordability Task Force

Are you in favour or opposition of the issue? (required)

In opposition

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below. Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video)
If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)

Please see attached letter.

5 June 2023

City Council Meeting 6 June 2023

Re: Agenda item 9.3.1 C2023-0415 House and Affordability Task Force Report

I am opposed to the Housing and Affordability Task Force Report as presented. I support the position presented by the Crescent Heights Community Association Planning Committee. This report has no data, documentation or detail to back its recommendations. Although there are many items that concern me, this letter focuses on Recommendation 1: d.I and d.II

I urge Council to learn from the experience of the 118 year old community of Crescent Heights that has successfully regenerated from a tired rundown community in the 1970s to the vibrant and very desirable community that it is today.

As a long time resident of Crescent Heights, I have witnessed many changes over the years, mostly for the better. When we bought our house in early 1975, the zoning was RM4, the area was run down and most of the single detached homes were rented and in very poor condition. Most of the properties were owned by investors wanting to build apartment buildings. Home buyers didn't want to invest in a home when an apartment building may be built next to them. Shortly after moving to the community, we joined a group of residents to change the zoning from RM4 to R2 in the late 1970s. As soon as the zoning changed, people started buying homes and renovating them which continued after the Crescent Heights Area Redevelopment Plan (ARP) was passed in 1997. Developing that ARP involved many resident volunteers who helped the City to assess every lot for suitable development options. When it was passed, the community was happy with the plan and buyers could invest in their homes with confidence. Builders and developers worked within the bylaws and ARP guidelines. We have many long time residents who built additions and second storeys, built a new house on the same lot or moved a few times within the community as their needs changed. The 1997 ARP worked well for us for many years.

Developers of award winning new communities cite four key factors required for a successful community: timeless architecture, thoughtful design, a strong amenity pool and abundant opportunities for community programming (Calgary Herald, 3 June 2023, p.D1). Crescent Heights meets all four key criteria. In the past 40 years, it has evolved into a beautiful, vibrant and very desirable community with a population increase of over 30% in 25 years. We have a diverse housing stock for all income levels with just 29% single detached homes. Integrating different building forms into the streetscapes of established communities needs careful consideration. One size does not fit all. Where row houses exist in new communities, they are integrated into the streetscape with similar height, size and design, not a radical shift in size. Randomly peppering established communities with large infill developments without any consideration for the existing developments and residents is not the answer. Established communities deserve the same design considerations as new communities.

Blanket rezoning to RCG will likely have the same effect on post 1950s communities as RM4 had on Crescent Heights years ago. Although the task force recommendation say "with guidance" for the various building forms, there is no indication what is recommended. A house is a major purchase and people will not invest in a house where a large development may be built next door. Blanket rezoning in the pre 1945 communities will likely eradicate the remaining heritage assets in and out of heritage guideline areas. These guidelines offer no protection for conserving heritage assets, only design guidelines for new

development. Since the guidelines were passed, the CHCA planning committee has received over 5 applications for rezoning applications from RC2 to RCG.

When Council is presented with rezoning applications, Administration presents the maximum district height, not the actual roof heights of the surrounding properties. In an area of mainly bungalows, that roof height is between 5.5 and 5.7 meters. An 11 metre building can be twice as high as the neighbouring properties, not just 1 metre higher as presented by Administration. A large building such a four unit row house next to or between bungalows overwhelms the streetscape. Blanket rezoning to RCG is a major shift from 45% lot coverage to 60% lot coverage. As the lot coverage of an older single detached home in an established area averages 38%, this is a major increase. Larger buildings absorb and radiate more heat during the summer months. 60% lot coverage allows little room for planting trees and shrubbery which are essential to remain resilient to climate change. 75% of Calgary's trees are on private property (Calgary Herald 22 Sept 2022). Although landscape requirements are part of the development permit process, the City does not follow up to ensure compliance.

We need more innovative solutions other than blanket rezoning such as the following:

1. Add secondary suites and laneway houses to RC1 and RC2 districts as a permitted use. Allowing both on the same lot would increase density and provide more affordable housing while still conserving the original home.
2. Include registered and purpose built secondary suites and lane houses as part of the housing unit count for density.
3. Identify areas in communities suitable for RGC and HGO districts the same as other land use districts to provide more stability for all buyers. These studies need to happen now with the help of community volunteers under the direction of the City and not wait for the LAP process which could take years to complete.
4. Develop a way to track new developments on a permanent basis. Adding more visible indicators to the My Property or DMAP websites would give an overall indication of the type of redevelopment and where it is occurring.
5. Using Kelowna as an example, initiate two separate design competitions for homes in pre 1945 and post 1950 established communities. Winning designs could be used by builders to fast track the development permit process. Each competition should one accessible housing option. Note what Kelowna has learned from this action which has been very popular. (City of Kelowna RU7 Housing Updates)

As past experience in Calgary has indicated, blanket rezoning in established communities is more likely to destroy the community than rebuild it. Careful and thoughtful rezoning taking the whole community into consideration will result in vibrant, healthy communities with a range of housing types and residents who enjoy living in the community.

Regards,

Isabelle Jankovic

Resident, Crescent Heights

Cc Terry Wong, Ward 7 Councillor



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Please note that your name and comments will be made publicly available in the Council agenda. Your e-mail address will not be included in the public record.

I have read and understand the above statement.

ENDORSEMENT STATEMENT ON TRUTH AND RECONCILIATION, ANTI-RACISM, EQUITY, DIVERSITY, INCLUSION AND BELONGING

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I have read and understand the above statement.

First name (required)

Pat

Last name (required)

Guillemaud

Are you speaking on behalf of a group or Community Association? (required)

Yes

What is the group that you represent?

Westgate Community Association



PUBLIC SUBMISSION FORM

What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

(required - max 75 characters)

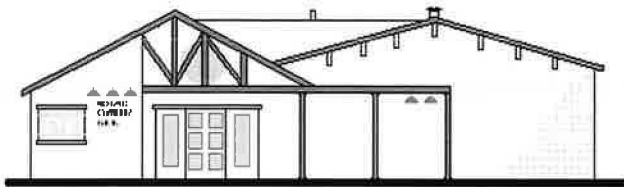
C2023-0415. Item 9.3.1

Are you in favour or opposition of the issue? (required)

In opposition

If you are submitting a comment or wish to bring a presentation or any additional materials to Council, please insert below. Maximum of 15 MB per submission (5 attachments, 3 MB per pdf document, image, video). If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)



Westgate Community Association 4943 8th Avenue SW Calgary, AB T3C2V8

2nd June 2023

Mayor Gondek, Cllr. Pootman's and Members of City Council.

Westgate Community Association has discussed the Housing and Affordability Task Force Recommendations. There appears to be no system for Communities or residents to offer feedback. As a community we felt it important to relay our points of discussion.

WCA appreciates that many residents require affordable housing now or in the future, however not every citizen or family requires assistance. Unfortunately, the report leaves the impression that majority of residents will require affordable housing, that is not so. Existing communities should not be destroyed in the effort to construct affordable housing everywhere.

- a) *Surveys/reviews of existing programs, policies and solutions both locally and in other relevant jurisdictions.

There is no information as to who and where the surveys or reviews were conducted, locations and communities. What did the survey compare to at these locations? How does that relate to the situation in Calgary?

- a) *Advice and policy recommendations relating to increasing, measuring and managing Housing Affordability and Affordable Housing along the entire housing continuum.

Lacking is the current needs and the predicted needs, the report does not include the current stock of affordable housing in Calgary, who is resident nor how it's assigned. Do we follow individuals through the continuum of housing or do they move on? How do we measure and manage affordable housing? References in the report refer to: low-income individuals, Indigenous people living in Calgary and equity-deserving populations, are you able to identify the groups?

Guiding principles: Community Centric, The Task Force will ensure that the issues, topics and possible solutions put Calgary's citizens at the forefront.

- Were citizens consulted and placed at the forefront?

Recommendations 1: Action (a) Include policy in the Municipal Development Plan immediately that every LAP should enable a minimum of 15% of the total housing units to be non-market Affordable Housing (as defined by the City) to provide equal distribution across the city.

What does 15% across the city mean? Consider the communities who currently have Affordable Housing, either Calgary Housing or other providers, will they be required to increase their share of Affordable Housing? Affordable Housing is provided within our community in the form of:

West Heritage Manor Co-Op, Sonshine Centre for women and children, secondary suites and above garage suites. To be equal the 15% target requires an evaluation of what is available and where, no community should be over run with Affordable Housing or Social Service provided housing.

Does the target include land that can be developed for non-market housing? If so, let the work begin immediately.

Recommendation 1: Action (d) Prepare the necessary bylaws to immediately: 1. Make the base District Residential – Grade – Orientated (R-CG) with guidance for single, semi-detached, row and townhouses into a single land use district.

Westgate Community cannot support this action, for the following:

*This amounts to blanket rezoning of every community in Calgary, when do the residents have the opportunity to respond?

*Upzoning to RCG units does not create affordability or family housing, RCG does not add to non-market housing.

* RCG units in established communities are priced higher than the housing that was destroyed to build RCG. They are neither affordable or family housing, many have NO yards.

*Density does not increase or offer Affordable Housing, that is a myth. What is created are small box style homes that are not suitable for families or those with mobility issues, too many stairs.

*What is the timeline for the term “thoughtful consideration” deemed as by City Council?

The result of blanket up-zoning compromises property values, the overall culture of a community, lack of desire to invest in their properties. No resident will have the assurance to enjoy their yards, not knowing if a large development will be built next door, creating loss of privacy and shadowing.

With redevelopment there is loss of mature green canopy, space for a garden and for children to play. Lot coverage of 60% is very different than lot coverage of 45%, the later has space for trees, gardens and play.

Consider communities with Heritage properties, this proposal will lead to further destruction of the limited Heritage properties still standing.

Developers have no interest in our communities nor are they involved in our communities. The only time they know we exist is to promote their next for-profit development. RCG removes the so called “missing middle” (usually an RC-1 home) and replaces it with un-affordable box style housing. All communities should be able to maintain diversity and choice in housing. Blanket up-zoning removes the ability for all communities to offer choice in housing. RCG must be determined on a case -by- case basis with extensive discussion with impacted neighbors and the community.

Secondary suites, garden suites and above garage suites must be considered as forms of Affordable housing. Retains the culture of the community whilst providing the opportunity for affordability.

Recommendation 1: Action (e) In the new Land Use Bylaw 1. Remove minimum parking requirements in all residential districts

***Westgate Community does not and cannot support this recommendation. As an established community with a C-Train station where no parking is provided for commuters. We are dealing with excessive non-resident parking on a daily basis.**

Recommendation 1: Action (h) Advocate to the Government of Alberta for legislative change to the MGA to allow affordable housing to be defined in a manner that exempts it from certain planning process requirements such as public hearing, which increases certainty and reduces timelines for developers and providers.

***Westgate Community supports the process of engagement and public hearings for all forms of housing. Residents must be able to express their opinions for or against all land use matters. Only then can residents become informed about the proposals. No level of Government has a crystal ball to determine what is or is not appropriate. We live in a democracy citizens should be able to voice their concerns and/or support.**

Recommendation 2: Action (a) dispose of City owned lands as soon as possible within TOD sites suitable for housing, including non-market housing.

(c) Identify City-owned parcels of land that collectively can be made shovel ready for Affordable Housing (minimum target of 1,000 units) Business units may need to rationalize future use of said lands that are not needed, in whole or in part, for their intended primary use.

A barrier to creating affordable housing, non-market housing is land costs and infrastructure, suggestions to resolve this can be:

- **Request a percentage of Affordable Housing be included in all new multi developments.**
- **Encourage agencies providing non-market housing to enter into joint ventures with developers.**
- **Create a process where residents move through affordable housing to market rental or home ownership**
- **Work with Attainable Homes and Habitat for Humanity to create more opportunities for affordable home ownership**
- **Create opportunities for Co-Op Housing groups to build, perhaps on City owned land with long term leases.**

Recommendation5: Action (a) and (i) Advocate to The Provincial Government to dedicate a portion of the Municipal Reserve for the purpose of establishing land banks in all new communities for Affordable Housing.

- **This would not impact Westgate Community, but would have implications on green space and natural areas in newer communities.**

Recommendation 5: Action (b)

(b) Enact a municipal bylaw under Section 364 of the Municipal Government Act to exempt properties held by non-profit organizations providing non-market housing from the municipal portion of property tax.

* In theory this sounds great, BUT who would be paying the difference for the lost tax? It would be the homeowners having to cover the tax losses. Not the best idea.

(c) Advocate to the Province to exempt properties held by non-profit organizations that are providing non-market housing from the provincial portion of property tax.

* Again, in theory it sounds like a lovely gesture, in reality someone has to make up for the loss in taxes, again it would be existing homeowners. Not the best move.

Perhaps create a lower based tax system to non-market housing providers, but do not create a no tax payment system.

Westgate Community and surrounding community members gave their valuable time for the past 3 years to work on the Westbrook LAP. The proposed Bylaw change to blanket up-zoning is an insult to the volunteers for the many hours given to the Westbrook LAP. Participants in the Westbrook LAP process were constantly told we are not blanket up-zoning your communities. Did we waste our time with the Westbrook LAP? Does the city value volunteer's contributions, yes or no?

A document created in 2011 "A Guide to Special Care Facilities for Applicants and Communities" contains valuable information for Community Engagement, perhaps it should be referred to.

Westgate Community Association is asking that you consider our concerns, we are requesting time for all Communities and residents to review the Report and offer creative solutions. By all working together solutions can be reached. We appreciate and understand the need for Affordable and non-market housing. The solution is not to overload any one community, every neighborhood must be involved. This issue is not one that can be rushed through Council, blanket up-zoning is not the answer, choice in housing must be a priority.

Regards

On behalf of Westgate Community Association

Pat Guillemaud, President

Kathy Makin, CPHR, Director responsible for Development



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I have read and understand the above statement.

First name (required)	Brian
Last name (required)	Hahn
Are you speaking on behalf of a group or Community Association? (required)	Yes
What is the group that you represent?	BILD Calgary Region



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What do you wish to do?
(required)

Submit a comment

How do you wish to attend?

You may bring a support person should you require language or translator services. Do you plan on bringing a support person?

What meeting do you wish to attend or speak to? (required)

Council

Date of meeting (required)

Jun 6, 2023

What agenda item do you wish to comment on? (Refer to the Council or Committee agenda published [here](#))

(required - max 75 characters)

Item 9.3.1 Housing and Affordability Task Force Recommendations, C2023-0415

Are you in favour or opposition of the issue? (required)

In favour

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If you have additional files to attach, email them to publicsubmissions@calgary.ca

Comments - please refrain from providing personal information in this field (maximum 2500 characters)



June 2nd, 2023

The City of Calgary
P.O. Box 2100, Station M
Calgary, AB T2P 2M5

Attention: Members of Council

Ladies and Gentlemen:

Re: May 4, 2023, Housing and Affordability Task Force Recommendations

BILD Calgary Region (BILD) supports housing for all, particularly the safety and dignity that a home, whether it be owned or rented, provides for citizens. Our members have a strong history for supporting the whole continuum of housing supply. The Resolve Campaign was spearheaded by Industry and continues to deliver to Calgary's affordable housing supply. This is in addition to the strong response as outlined herein of BILD members to market priced housing demand, which also helps in our collective quest for housing affordability for all. Examples of BILD members' contributions to affordable non-market housing is attached to this letter.

BILD believes that housing affordability needs to be tackled across the full housing continuum. In the November 28, 2022 report, [Governments alone cannot fix Canada's housing affordability challenges](#), by the Canada Mortgage and Housing Corporation (CMHC) Deputy Chief Economist Aled ab Iorwerth, states rent subsidies and more social housing are helpful but more needs to be done across the entire spectrum and the private sector needs to be involved. The report emphasises there must also be increased supply of housing aimed at the market. "... to overcome these affordability challenges, we need a range of government policies and investments stemming from several sources, notably the private and public sectors. The scale of the challenge is so large that the private sector must be involved – governments cannot do this on their own ... The interconnectedness of housing means that both tracks must be pursued ... Governments must take a system-wide view and not encourage housing supply for low-income households by discouraging housing supply for middle-income households."

BILD has reviewed the Housing Affordability Task Force recommendations and the associated actions. BILD and its members agree with many of the recommendations and actions. We provide this letter of support toward taking constructive action on housing affordability and propose further recommendations which we urge Council to incorporate into an overall plan to address and improve housing affordability in Calgary.

Current Status:

In [RBC's March 2023, Housing Trends and Affordability Report](#), Calgary's market-priced affordability ranks second most affordable amongst major Canadian metropolitan centers and better than the Canadian average shown. However, the share of income a household needs to cover ownership costs for Calgary is 43.2%. This is above both the long-term average for Calgary (38.8%) and the level of household before tax income, 30%, which the CMHC considers as affordable.

According to a study commissioned by [UDI Edmonton, Housing Everyone - Impacts of Increasing Costs to Housing Affordability](#), "An increase of \$10,000 to the purchase price of an entry level home prices 7,591 households out of the market." As outlined in our further recommendations, all reasonable efforts should be made to minimize the cost to bring on additional housing supply.

In the [April 2023 Housing Supply Report](#), the CMHC shared the positive news, "... Calgary hit a record in 2022, with 17,306 housing starts, slightly outpacing the previous record seen in 2014." This news underscores Industry's willingness and ability to respond to demand. The balance in Calgary housing supply starts in 2022 (see Table 1 on page 22 in the report), was also noted by the CMHC, "This was the second year in a row where housing starts increased across all dwelling types."

The CMHC goes on to comment, "Purpose-built rental apartments also accounted for a sizable share (45%) of total apartment starts in 2022. In fact, based on data going back to 1990, rental starts were at the highest level on record (3,505 starts) over the past year. The number of units under construction was also at a record high (6,500 units)."

The CMHC's final comments in respect of Calgary are, "The outlook for the Calgary area has improved significantly over the past year. Consequently, any new ways to create additional housing supply for the growing population will be of great importance."

Calgary's overall housing starts remain strong into 2023. [CMHC's 2023 April Monthly Housing Starts](#) (Click "View Highlights" for interactive tables) show year over year growth. BILD members are also reporting a strong start to the year and expect this trend to continue throughout 2023.

Going forward—supply is the key to unlocking affordability

[Chapter 1 of Federal Budget 2022](#) made clear, "There are a number of factors that are making housing more expensive, but the biggest issue is supply."

The urgency to facilitate more housing supply was highlighted by the CMHC in its [June 2022, Canada's Housing Supply Shortages: Estimating what is needed to solve Canada's housing affordability crisis by 2030 report](#):

- "We anticipate that Canada will need an additional 3.5 million units to restore housing affordability beyond current projections [by 2030]"
- "That means [a total inventory of] over 22 million housing units will be required by 2030 to help achieve housing affordability for everyone living in Canada. Delivering more housing supply, beyond predicted growth in the number of households, will enable better matching of households with the housing they want."
- "... Canada's approach to housing supply needs to be rethought and done differently. There must be a drastic transformation of the housing sector, including government policies and processes, and an 'all-hands-on-deck' approach to increasing the supply of housing to meet demand."— Aled ab Iorwerth, Deputy Chief Economist, CMHC
- "There have been a multitude of reports on Canada's housing system over the last few years. Government panels have been struck and the answer is now clear: we need more housing supply. We need to take drastic measures now to produce more housing—not more reports," is a supporting call to immediate action.

The importance of increasing housing supply will be even greater as Canada seeks to attract more immigrants. The federal government has ambitious immigration targets as outlined in their immigration policy, [2023–2025 Immigration Levels Plan](#). "Canada aims to welcome from 410,000 to 505,000 new permanent residents in 2023, from 430,000 to 542,000 in 2024, and 442,500 to 550,000 in 2025."

While this will almost certainly bring more skilled and experienced labour resources to assist in addressing the labour force requirements to add housing supply, it will also increase demand for all forms of housing supply.

In that respect, Industry agrees Recommendations 1 and 2 from the Housing and Affordability Task Force are on target:

- Recommendation 1: **Make it easier to build housing across the city.**
- Recommendation 2: **Make more land available to build more housing across the city.**

Industry urges Council to direct that Administration ensure these two key recommendations apply across the full continuum of both market housing and non-market housing.

Focusing on those two recommendations as key guidance will serve existing and future Calgarians by addressing housing affordability across the full spectrum of housing in Calgary. To the Administration's credit, examples of constructive collaboration with industry is already underway on initiatives which include Balancing Policy for Mutual Success and the new process for Growth Applications within New Communities. Industry agrees provision of non-market housing is a fundamental need. However, failure to address demand for market-priced housing or adding time and costs to the market-priced development and housing processes will drive the need for non-market housing higher and exacerbate affordability issues.

BILD's Additional Recommendations:

BILD congratulates the Housing and Affordability Task Force on the work so far on housing affordability. In addition to the actions the Task Force proposed, Industry offers and encourages additional important actions and recommendations (see full details attached) which, with Council support and direction, will serve housing affordability in Calgary:

1. Costs of the strategy must be neutral or better
2. Increase the number of fully serviced lots
3. Labour supply
4. Federal Advocacy
5. Monitoring and reporting
6. Planning and development policy
7. Recognize the constrained capacity of existing infrastructure in established areas
8. Continue to recognize and celebrate Calgary's successes

BILD's members are not simply financially invested in Calgary, with so many of them being long-term citizens, they are personally invested in Calgary's success and all aspects of our community's well-being, including affordability. BILD urges Council to press forward on this critical matter for our community by adopting and incorporating BILD's additional recommendations.

We would be pleased to meet with Council or the Task Force to discuss these matters further. Should you have any further questions, or should the Task Force or Administration wish to further engage with BILD on these matters, please contact the undersigned.

Yours truly,



Brian R. Hahn
CEO, BILD Calgary Region

Cc: Stuart Dagleish, GM Planning and Development Services
Tim Ward, Manager, Housing Solutions
Josh White, Director, Calgary Approvals Coordination Planning & Development
Debra Hamilton, Director, Community Planning
Melanie Hulsker, Director, Community Strategies
Jeff Chase, Director, Partnerships
BILD Calgary Region Board of Directors

Attachments

[Habitat for Humanity, Avalon Master Builder partner on 24-unit Livingston project](#)

[Attainable Homes – Our Current Builder Partners](#)

[Bridlewood Affordable Housing](#)

[Calgary Home Builders Support Affordable Housing Big Time!](#)

[Alberta, CMHC Investing \\$54M to Build 17 Affordable Housing Projects](#)

[Eighth permanent supportive housing development through Resolve Campaign unveiled in Hillhurst](#)

[Resolve campaign a huge success](#)

[Aurora on the Park](#)

[Calgary Homebuilders Honoured](#)

[Sunsetting Calgary's 10 Year Plan to End Homelessness: Learnings from a Decade of Progress & What's Next](#)

[Resolve Campaign](#)

[The Resolve Initiative Continues To Provide Safe Housing For Calgary's Homeless – A Look Back At The Impacts of Qualico's Donation](#)

[Resolve YYC](#)

[Morrison Builds for Those in Need](#)

[New affordable housing development opens in downtown Calgary](#)

1. **Costs of the strategy must be neutral or better**—additional costs, whether supported by the MIL rate or other means, run contrary to the primary aim of the Task Force—affordability. There are several recommendations where the Financial Impact is denoted with “\$\$\$”. Prioritize zero added cost items; adding costs or shifting costs, which are not otherwise offset with savings, will end up in household expenses and not improve affordability. Industry specifically cautions against adopting any uncompensated developer requirements for non-market housing in any Local Area Plan. Any such requirements will simply drive the cost of market housing up and increase the need for non-market housing. Non-market affordable housing is a societal issue – should additional costs be incurred to address non-market housing, those costs should be fairly shared across all taxpayers not added to the cost of new housing.
2. **Increase the number of fully serviced lots**—show support to the Task Force's Recommendation 2, by increasing the number of fully serviced lots by way of timely utility construction. To support this, Council, as sole shareholders of ENMAX, should adopt a Calgary-first approach in terms of prioritizing ENMAX's investments in infrastructure for growth, which support increases in all forms of housing supply, as well as investments in infrastructure which advance the safety and reliability of electric utility service for Calgarians.
3. **Labour supply**—there are many pressures on housing cost and constraining supply. Both accredited and unaccredited labour supply are vital and indispensable to address the demand for housing affordability and availability. Provide support to focused immigration and housing policy by advocating for increases to skilled and experienced worker immigration and federal acceptance of appropriate level of Alberta nomination certificates.
4. **Federal Advocacy**—there are several provincial government asks but few recommended federal government asks. We encourage Council to direct federal advocacy as follows:
 - Remove barriers to homeownership for first-time buyers by fixing the stress test; avoid more mortgage rule tightening; reintroduce 30-year amortizations for CMHC insured mortgages. Any added risk from this change is low and is appropriate given Canada's very low default rates on mortgages.
 - Lower government-imposed costs that add to affordability challenges: Fix GST Rebate thresholds; fix taxation on purpose-built rentals.
 - Address labour shortages; increase skilled worker immigration; support skilled workers.
 - Support increased productivity; Support modular and factory-built construction.
 - Avoid adding costs through building codes and related regulations. For example, climate policies that require more energy efficient construction or retrofitting should be as cost neutral as possible by providing efficient financing for clean energy improvements and encouraging efficiency standards (e.g., enerPHit) whereby utility savings offset the financed cost of improvements. Ensure affordability is a core building code objective; innovation before regulation.
5. **Monitoring and reporting**—direct regular reporting to Council and Council Committee on the adopted action plan, including:
 - Affordability metrics like those included in the RBC Housing Trends and Affordability Report. The Task Force has recommended “Increase and diversify the supply of housing. Boost development by 1,000 more market homes beyond what is normally built in a year, and at least 3,000 non-market affordable homes a year.” Industry accepts the Task Force recommendation regarding the target number of additional non-market affordable homes per year as having been researched and deemed appropriate. However, BILD believes an arbitrary target of 1000 additional market homes per year may be insufficient to improve or maintain affordability.
 - Respectively, additions to fully serviced market and non-market lots.
 - Assessment of the cumulative reductions in policy/red tape for both market and non-market housing against any added policy.

- The cumulative costs of the plan and the tangible cumulative offsets to those costs in an effort to demonstrate achievement of overall affordability.
- 6. Planning and development policy**—Avoid reigniting the community opposition which emerged as part of the process which resulted in the Guide to Local Area Planning with blanket, pan-Calgary approaches to local area planning. Direct Administration to continue to work with communities which welcome redevelopment and added density. Developers and redevelopers want to be part of processes which continue to build communities up, not tear communities apart. The current welcoming community approach Industry understands Administration is taking is strongly preferred.
- 7. Recognize the constrained capacity of existing infrastructure in established areas**—where redevelopment and increased density is welcomed by the community, direct Administration to leverage life-cycle replacement investments in infrastructure like water distribution lines, wastewater collection trunks and storm drainage infrastructure, to minimize the cost of redevelopment. Adding or shifting costs, which end up in redevelopment or other fees, adds to an already complex and costly redevelopment process. Direct Administration to leverage both the opportunity of life-cycle replacement as well as the accretive revenues and fees from redevelopment and intensification to support City investment in needed capacity upgrades and affordability.
- 8. Continue to recognize and celebrate Calgary's successes**—contrary to the narrative advanced by many, Calgary is one of the most compact major metropolitan areas in Canada with:
- According to [Statistics Canada](#), the fourth highest downtown population density—ranking only behind, Vancouver, Toronto, and Montreal and notably ahead of Ottawa, Hamilton, Winnipeg, Victoria, Edmonton, Kelowna, Saskatoon, Regina, and Kamloops.
 - While the reference is dated, in [2014, Maclean's magazine](#) postulated, "Considering each City's current density, how big would Canada's major centres be if the nation's entire population moved in?" Of the cities shown on the Maclean's map (Montreal was not shown), Calgary ranked 4th behind Vancouver, Toronto, and Winnipeg.
 - In respect of the foregoing, the superior affordability of Calgary housing when compared to Vancouver, Toronto, and Montreal.