



December 2nd, 2025

The City of Calgary
P.O. Box 2100, Station “M”
Calgary, Alberta T2P 2M5

Attention: Chair Andre Chabot & Members of the Infrastructure & Planning Committee

Dear Members of the Infrastructure and Planning Committee (IPC):

**RE: December 03, 2025, IPC Meeting,
Item 7.2: Infrastructure Readiness for Residential Grade Oriented Infill (R-CG), IP2025-1000**

Recognizing the current discussion on citywide zoning, and the relevance of Item 7.2: Infrastructure Readiness for Residential Grade Oriented Infill (R-CG) to that discussion, BILD Calgary Region (BILD) provides this letter to IPC.

At a summary level BILD’s comments, feedback and respectful recommendations are:

- As indicated in its April 12, 2024, letter to Council (copy attached—see Appendix B to this letter), BILD supported and remains supportive of aims of the citywide zoning bylaw. Nevertheless, we wish to assure IPC members and Council, **BILD and its members will continue to constructively collaborate with The City to enable robust, cost-effective citywide growth regardless of how the current discussions on citywide zoning turns out.**
- **Should changes to the citywide zoning bylaws continue to be considered**, including full reversal or repeal of those bylaws, **we strongly recommend that The City take steps to ensure:**
 - **Applicants have confidence that they will be treated fairly**—applicants should be assured that applications currently underway, which have been made and rely on the rules in place at the time of application, will be processed based on those rules.
 - **To the extent a review which may result in a repeal or reversal of the bylaws is going to proceed, as soon as reasonably possible, The City should provide clear communications on the steps, timelines and opportunities for the public and interested or impacted parties to have their views heard and understood.** Communicating a clear understanding of how much longer applications will be received under the current citywide zoning rules is also critically important. BILD will assist The City in distributing all relevant information to BILD members.
 - **A review process is undertaken to identify any unintended consequences to other bylaws and/or policies which this Committee and Council may wish to retain.**

In reviewing the materials provided in support of item 7.2, BILD has also identified some wording in IP2025-1000, Attachment 2, which may create some confusion for members of Council and the public in respect of growth-enabling infrastructure funding. BILD’s concerns are outlined in more detail in Appendix A to this letter.

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Re: Item 7.2: Infrastructure Readiness for Residential Grade Oriented Infill (R-CG), IP2025-1000

In respect of these and related concerns, **BILD respectfully requests IPC to seek clarification or confirmation from Administration of:**

- Development pays 100% of its share of its benefit from growth-enabling infrastructure by way of The City's Off-site Levy regime.
- The City's capital expenditure capacity and prioritization criteria, including how those are applied and relate to growth-enabling infrastructure.
- How The City's budgeting and planning principles and processes support maximization of services from existing infrastructure and deferral of capital expenditures, where and when appropriate.
- How The City leverages infrastructure lifecycle/end-of-life renewal and/or replacement to enable growth and how accretive utility rate, property tax and other municipal revenues are used to rationalize growth-enabling capital expenditures.

Regardless of how Council proceeds on the matter of citywide zoning, BILD and its members wish to confirm that we are committed to continuing to work collaboratively with the City as its partners in city-building toward our common goals of realizing citywide affordability, innovation, quality and choice in land development, redevelopment and housing.

Thank you for your attention to these important matters.

Sincerely,



Brian R. Hahn
Chief Executive Officer,
BILD Calgary Region

Attachments

Appendix A: Additional Background

BILD Calgary Region December 2nd, 2025, Letter to IPC

Re: Item 7.2: Infrastructure Readiness for Residential Grade Oriented Infill (R-CG), IP2025-1000

On April 12, 2024, BILD wrote to Council (copy attached in Appendix B) in support of Calgary's Housing Strategy 2024-2030 – Land Use Amendment Citywide, LOC2024-0017, and Land Use Bylaw Amendments, CPC2024-0213 (“citywide zoning”). BILD's correspondence raised questions regarding the implementation of the proposed bylaw amendments:

1. Has the City completed an audit/review of how the proposed bylaw might affect existing policy? If not, will this task be performed?
2. Have studies been undertaken to assess total infrastructure capacity as it relates to changing base demand profiles, in addition to increased demand resulting from the proposed zoning bylaw?
3. Has funding been established for those areas that will require upgrades to meet changing demands?

Mitigation of Unintended Consequences of Changes to Citywide Zoning Preserving Other Beneficial Bylaw Amendments

While not an exhaustive list, some examples of potentially impacted bylaws/policies are:

- **Exemption of Development Permit Requirements for Fee Simple Rowhouses:** Council directed Administration to bring forward amendments to the Land Use Bylaw to exempt fee simple rowhouse developments that comply with Bylaw requirements in developing communities from the need to obtain a development permit. This change was approved by Council on June 10, 2025, and BILD believes it is in the best interests of the City for this exemption to remain unaffected by any change to the citywide zoning bylaw.
- **Class 1 Bicycle Parking Requirement:** The minimum Class 1 bicycle parking rate for multi-residential developments was reverted from the 2022 requirement of 1.0 stall per unit back to the previous standard of 0.5 stalls per unit. Council approved this amendment on September 9, 2025, and again, BILD believes it is in the best interests of the City for this change to remain unaffected by any change to the citywide zoning bylaw.
- **Mobility Storage Lockers (bikes):** Council also approved the removal of the requirement for mobility storage lockers in the R-CG and H-GO districts, as the requirement was creating undue cost pressures for new housing. This amendment was approved on September 9, 2025, and again, BILD believes this decision should likewise remain unaffected by any change to the citywide zoning bylaw.

Appendix A: Additional Background

BILD Calgary Region December 2nd, 2025, Letter to IPC

Re: Item 7.2: Infrastructure Readiness for Residential Grade Oriented Infill (R-CG), IP2025-1000

Further Clarity of Growth Infrastructure Funding and Capital Expenditure Capacity and Prioritization

On November 20, 2025, BILD also wrote to Council (copy attached in Appendix C) in respect of the City of Calgary's proposed *Budget 2026*. Based on BILD's review of item 7.2 supporting materials provided to IPC, BILD believes citywide zoning, BILD's *Budget 2026* concerns and recommendations, and Item 7.2 are connected. Accordingly, BILD provides the following input and suggestions to Committee in the hope these recommendations will be incorporated into the Committee's recommendations to Council.

In its November 20, 2025, letter to Council regarding *Budget 2026*, BILD made the following recommendations:

- Disclosure of capital expenditure capacity and prioritization criteria.
- Adoption of budgeting and infrastructure planning principles focused on maximizing existing infrastructure service and deferring capital, where prudent.
- Addition of Calgary's water loss rate as a Key Performance Measure with reduction targets.

Two passages in IP2025-1000, Attachment 2, appear to BILD to be related to those recommendations, as well as Questions 2 and 3 from BILD's April 12, 2024, letter to Council. Those two passages are on Page one of IP2025-1000, Attachment 2, and they respond to "How Infrastructure is Funded," for Potable Water and Wastewater. Each passage contains the following wording:

"Funded through utility rates. Developers pay for infrastructure triggered by their projects."

BILD respectfully asks the Committee to request Administration clarify and confirm that development pays 100% of its benefit from growth-enabling infrastructure through development levies. Such clarification is consistent with the City of Calgary's off-site levy structure and the City's *Principles for a New Offsite Levy Bylaw*. In the absence of a clarification, the statement, "*Funded through utility rates,*" may leave Councillors and the public with an incorrect impression of how growth-enabling infrastructure is funded.

BILD acknowledges that, in pursuing the maximization of services from existing infrastructure and undertaking lifecycle renewal and replacement of end-of-life infrastructure to maintain levels of service and support initiatives such as reducing Calgary's high rate of water loss, funding certain projects through utility rates may also appropriately enable growth. To the extent that Administration confirms this, it may help clarify the designation "*Funded through utility rates.*" BILD also acknowledges that utility rate funding may also be justified by accretive utility rate, property tax and other municipal revenues. BILD strongly supports and endorses both approaches. To the extent either applies, **BILD respectfully asks the Committee to request Administration provide full, transparent disclosure of this rationale, as well as all other capital expenditure prioritization criteria and the methodology used to determine capital expenditure capacity.** Full, transparent provision of those items provides needed clarification and better certainty to all interested parties and the public.

**Appendix B: BILD April 12, 2024, Letter to Council,
Re: Calgary's Housing Strategy 2024-2030 – Land Use Amendment Citywide, LOC2024-0017,
and Land Use Bylaw Amendments, CPC2024-0213**



April 12, 2024

Delivered by Email

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

Attention: Mayor Gondek & Members of Council

Dear Members of Council:

RE: Calgary's Housing Strategy 2024-2030 – Land Use Amendment Citywide, LOC2024-0017, and Land Use Bylaw Amendments, CPC2024-0213

Consistent with BILD's mandate, we strive to support those municipal policy initiatives which reasonably and cost-effectively lower the barriers to development and home construction. The proposed City-wide, land use redesignation (zoning) bylaw has the opportunity to improve Calgary's housing supply by removing some barriers. For these reasons specifically we would like to offer this letter of support. In addition to our support, we would like to pose clarifying questions regarding the proposed bylaw. Below are two key questions that have been informed through industry feedback. We believe that open discussion and resolution of these questions is paramount to the ultimate effectiveness of this bylaw.

- 1. Has the City completed an audit/review of how the proposed bylaw might affect existing policy? If not, will this task be performed? A notable example of this is the interaction between existing Area Redevelopment Plans and newly approved Local Area Plans. It has been our members' experience that conflicting policies, as well as conflicts at the development and construction stages, could result in policy amendments or unintended delays at the application level, which in turn affects the timely processing of applications.*
- 2. Have studies been undertaken to assess total infrastructure capacity as it relates to changing base demand profiles, in addition to increased demand resulting from the proposed zoning bylaw? Has funding been established for those areas that will require upgrades to meet changing demands? Most specifically, we are concerned with resolving changing electrical demand in homes, heightened by our transition to Net-Zero Housing and EV Charging capacity. Additionally, we seek clarity on conflicting messaging and understanding regarding city water-related infrastructure capacity and end-user demand for existing and new infrastructure.*

BILD remains supportive of the aims of this proposed zoning bylaw. As mentioned above, it has the opportunity to cost-effectively improve Calgary's housing supply by removing some of the barriers to development and home construction. We are committed to collaborating with The City and stakeholders

We encourage you to visit bildcr.com for industry updates

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**Appendix B: BILD April 12, 2024, Letter to Council,
Re: Calgary's Housing Strategy 2024-2030 – Land Use Amendment Citywide, LOC2024-0017,
and Land Use Bylaw Amendments, CPC2024-0213**



to explore viable answers to the above noted questions. We wish to continue our long-standing partnership in City building to foster thriving communities in the Calgary region.

Thank you for your attention to these important matters.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian R. Hahn".

Brian R. Hahn
CEO, BILD Calgary Region

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**Appendix C: BILD November 20, 2025, Letter to Council,
Re: BILD Calgary Region Feedback on the City of Calgary Budget 2026**



November 20, 2025

His Worship, Mayor Farkas and Members of Council
The City of Calgary
800 Macleod Trail SE
Calgary, AB
T2P 2M5

Subject: BILD Calgary Region Feedback on the City of Calgary Budget 2026

Dear Mayor and Councillors,

On behalf of BILD Calgary Region (BILD) and our 600 member companies, representing Calgary's builders, developers, and industry partners, we appreciate the opportunity to provide feedback on Budget 2026.

BILD members are deeply invested in Calgary's success. They are the largest funders of growth-enabling infrastructure and key contributors to the City's ten home-essential services. In 2023 and 2024 alone, industry payments to The City exceeded \$250 million annually, supporting municipal employment, service delivery, and critical infrastructure that enables new housing and economic growth.

At year-end 2024, over \$584 million in industry off-site levy funds were held in City Capital Deposits and Reserves, with an additional \$665 million committed under executed Development Agreements through 2027. These investments underpin Calgary's serviced land supply—ensuring The City can meet housing demand, attract talent, and sustain economic momentum.

Between 2021 and 2025, there were more than 81,000 housing starts. According to the Canadian Home Builders Association, 2024 residential construction generated \$4.5 billion in annual wages, 57,000 jobs, and \$11.6 billion in construction value. This economic activity benefits every Calgarian through higher property tax revenues, utility payments, and franchise fees, while ensuring continued access to attainable, high-quality homes.

As a financially significant partner in city-building, BILD's members bring deep technical expertise, long-term investment, and a practical understanding of how to deliver infrastructure efficiently. We believe effective collaboration between Council, Administration, and industry produces the best outcomes for all Calgarians. The most powerful way to improve housing affordability and sustain municipal prosperity is to enable private investment across both residential and non-residential markets.

Key Areas of Interest and Support:

- **Accelerating capital expenditures** to match housing and infrastructure [demand](#);
- **Maximizing serviced land supply** to maintain affordability and [competitiveness](#);
- **Ensuring certainty and transparency** in long-term infrastructure planning; and
- **Improving service levels** across approvals, water, transit, roads, and emergency operations.

We commend and support the move toward a **city-wide 10-year capital investment plan**, which will strengthen sequencing, prioritization, and transparency of City spending. Regular public reporting on this plan will enhance predictability for industry and ensure off-site levy funds are used as intended.

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www.bildcr.com

**Appendix C: BILD November 20, 2025, Letter to Council,
Re: BILD Calgary Region Feedback on the City of Calgary Budget 2026**

Areas Requiring Further Clarity and Action:

- **Recognition of Industry Financial Contributions:** Budget 2026 should clearly reconcile off-site levy revenues and expenditures to reflect the full scale of developer-funded growth enabling infrastructure.
- **Transparent Capital Prioritization:** The City should publish the criteria and assumptions used to determine capital capacity and project prioritization.
- **Water Loss and Asset Management:** BILD supports renewed efforts to reduce Calgary's high water loss rates through measurable targets, clear accountability, and reinvestment of savings.
- **Capital Budget Execution:** Persistent underspending must be addressed by improving internal resourcing and project delivery capacity.

By advancing these recommendations, Council can strengthen transparency, accountability, and public trust while helping to keep Calgary among the most affordable and livable cities in Canada.

BILD Calgary Region and its members look forward to continued collaboration with Council and Administration to ensure Budget 2026 delivers a prosperous, well-serviced, and affordable city for all Calgarians.

Yours truly,



Brian R. Hahn
Chief Executive Officer
BILD Calgary Region

Attachment