



URBAN
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INSTITUTE

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May 5, 2026

Jeff Moi
General Manager of Engineering & Operations
City of Port Moody
100 Newport Dr
Port Moody, BC V3H 5C3

RE: City of Port Moody ACC Program

Dear Mr. Moi,

On behalf of the Urban Development Institute, we are writing to express serious concerns with the Amenity Cost Charge (ACC) Program proposed by the City of Port Moody. We do not believe there has been adequate consultation on the proposed new charge, and we are concerned about an increase in charges that will result from the ACCs replacing the Community Amenity Contribution (CAC) Policy – especially for in-stream projects.

CONSULTATION

In our [March 25 letter](#), we requested “*meaningful input on the financial analyses that inform the ACC and DCC policies before they are brought forward for consideration*”. Despite this, our first opportunity to engage on the proposed ACC framework yesterday, and the City is expecting our comments today. This does not provide UDI and its members adequate time for thoughtful or substantive input.

In addition, there was no information provided at the City’s ACC session regarding the financial assumptions. Advancing a policy of this magnitude without the opportunity for informed feedback erodes confidence in the proposed rates and the process used to establish them.

This approach falls short of standard practice in other municipalities. The City of Burnaby and the District of Squamish, among other jurisdictions, have directly engaged industry in reviewing financial assumptions and viability testing to ensure rates reflect real market conditions.

Many of our members were also confused about the instream protection for projects as the City migrates from CACs to ACCs (see below). This is especially concerning for builders with larger phased projects.

We strongly recommend that the City incorporate the May 20 UDI Liaison Committee to discuss the ACCs and provide our members with the full financial testing and underlying assumptions for the program.

MARKET CONDITIONS

As discussed in our meetings, there is significant uncertainty in our sector. This is largely due to the cost-of-delivery crisis. Construction costs, government fees, and other requirements remain volatile. Purchasers and renters have “hit a wall” in terms of what they can afford to pay for housing, as our members can no longer deliver new housing at purchase prices or rents that British Columbians can afford.

In our March 25 letter, we noted that this is why we are seeing sales decline as well as projects being postponed, cancelled, or facing receivership. This is all resulting in a rapidly deteriorating market in which few new projects can launch.

In this context, any further increase in fees will materially threaten project viability and risks halting or reshaping already advanced developments as well as delaying projects further and lengthening the timeframes of the current slowdown, which will create a gap in future housing supply.

This is why UDI has been seeking reductions in fees and requirements from municipalities to make projects viable, so they can proceed. The shift from negotiated CACs to the proposed ACC framework represents an increase of almost double (\$4,500 to \$7,159) per unit for high-density projects, which are facing the most difficult headwinds in our sector. At this scale, projects that were previously viable under agreed CAC structures will face cost pressures that may result in the need for reduced unit counts, deferrals or even cancellations.

IN-STREAM PROTECTION

The City’s proposed approach to in-stream protection requires greater clarity. As currently presented, it appears insufficient to cover projects already advancing under the existing framework. The Provincial *Amenity Cost Charge Best Practices Guide* is clear that ACCs

should not apply to developments with complete applications for a building permit, development permit, or zoning bylaw amendment submitted prior to bylaw adoption. The City should explicitly confirm that its policy aligns with this direction.

We also need to discuss the impact the ACC program will have on future phases of large multi-phase projects that have agreed-upon CACs. In cases in which builders of these projects who have agreements with the City regarding their fees and charges, future surprising and substantial ACC payments may be mandated on top them. Multi-phase projects need to have adequate in-stream protection to ensure they can move forward without having to face changing requirements mid-stream.

The Urban Development Institute urges the City to pause advancement of the proposed ACC framework until the financial assumptions, in-stream protections, and treatment of multi-phase projects are fully clarified and reviewed with industry. Without these changes, the Program risks undermining project viability at a time when housing delivery is already under significant pressure and may unintentionally delay or eliminate projects that are otherwise ready to proceed.

We remain committed to working with the City to develop a feasible approach that supports both infrastructure funding and the continued delivery of housing, and welcome discussion at the upcoming Liaison Committee meeting.

Yours sincerely,



Michael Drummond
Interim President and CEO, Urban Development Institute