

# Strathcona County Affordability of Housing - Red Tape Reduction Report



March 2023

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## 0. Introduction

### 0.1 Background

In August 2020, the Rural Development Network (RDN) completed a Housing Needs and Demand Assessment for Strathcona County. The assessment underscored that housing is unaffordable for many residents in Strathcona County and low-income households may face challenges finding and maintaining suitable housing.

The assessment concluded with the overarching recommendation to initiate a community led approach to affordable housing, with four specific recommendations:

RECOMMENDATION 1 – Review best practice strategies to mitigate housing gaps

RECOMMENDATION 2 – Prioritize the Land Use Bylaw amendments for the Urban Service Area

RECOMMENDATION 3 – Conduct a homelessness estimate to better understand housing needs

RECOMMENDATION 4 – Continue to build local and regional partnerships to respond to housing and homeless needs

In May 2021, Planning and Development Services presented the PDS Affordable Housing Options report to Council, outlining various actions and strategies that would advance recommendations 1 and 2 of the Rural Development Network's Housing Needs and Demand Assessment.

To address the Planning and Development Services actions and strategies of the May 2021 Affordable Housing Options Council report, the PDS Affordable Housing Implementation Plan was completed in February 2022, and recommended four initiatives, including:

INITIATIVE 1: Affordable Housing Units – Private Development

INITIATIVE 2: Affordable Housing Units – County Lands

INITIATIVE 3: Community Redevelopment Strategy

INITIATIVE 4: Community Redevelopment Strategy Implementation

Each initiative has associated projects. Initiative 1: Affordable Housing Units – Private Development includes the following three projects:

- Project 1: Inclusionary Housing
- Project 2: Red Tape Reduction
- Project 3: County Funded Incentive Program Options

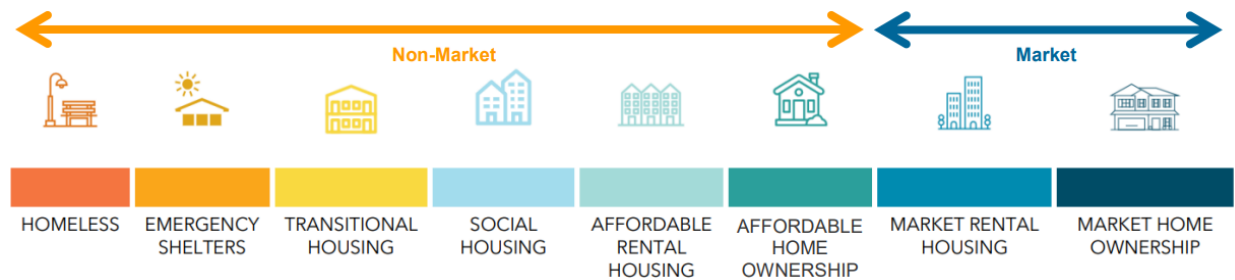
Project 1: Inclusionary Housing has previously been completed. **This project is focused on Initiative 1 – Project 2: Red Tape Reduction**, where the intent is to create a report that explores and recommends ways to reduce red tape and streamline applications for purpose built rental and non-market housing applications from private developers, affordable housing providers or landowners

throughout the County for Council’s consideration. Project 3: County Funded Incentive Program Options is concurrent with Project 2: Red Tape Reduction.

0.2 Project Overview

Some existing County regulations may limit opportunities for affordable residential options and make the development of housing more costly. Through this project, Planning and Development Services explored ways to reduce red tape for affordable residential options through a review of the County’s Land Use Bylaw 6-2015 and best practices used within the Edmonton Metropolitan Region and the province. Land Use Bylaw regulations related to supportive and affordable housing related uses, secondary suites and garden suites, parking, and amenity space were reviewed for red tape and solutions have been proposed as outlined within the report.

The red tape reduction project looked at the overall affordability of housing across the housing spectrum, shown below. This includes housing units provided at below market value (non-market) through affordable housing providers and housing units provided at market value (market) by private landowners or developers. Housing affordability can be improved by both an increase in the supply of non-market housing and an increase in either the supply or diversity of market housing.



Sections 1 – 4 outline existing County regulation, the impact of existing County regulation on the affordability of housing within the County, as well as proposed solutions to mitigate those impacts and reduce red tape allowing for cost savings that can be transferred to the renter, homeowner or non-profit organization.

The proposed solutions are intended to generally increase residential options that are more affordable so that suitable housing choices are available throughout our community. Diversity of housing choices can have a substantial impact on both affordability and a neighbourhoods ability to accommodate an individual through different life stages (aging in place). Where these proposed solutions are applied to market housing, the intent is that it will reduce the need for non-market housing within the community.

A summary table of proposed solutions has been included under Section 0.3.

### 0.3 Summary of Proposed Solutions

Table 1: Summary of Proposed Amendments			
ITEM	EXISTING REGULATIONS	PROPOSED AMENDMENTS	INTENT
1 Supportive and Affordable Housing Related Uses	The current Land Use Bylaw includes a number of similar supportive and affordable housing related uses that overlap and are inconsistently listed across zoning districts.	Reduce overlapping supportive and affordable housing related uses by replacing with a generalized use and adding as a listed use where similar forms of structures are already considered.	Reduces stigma driven land use conflicts, increases clarity, shifts from regulating the user to regulating the land use and increases opportunities for residential options that are affordable.
2 Secondary Suites and Garden Suites	The current Land Use Bylaw allows for secondary suites and garden suites in a limited number of urban residential zoning districts, and secondary suites are limited to single detached dwellings.	Provide additional opportunities for secondary suites and garden suites.	Creates increased opportunities for a diversity of dwelling types for all ages, incomes and abilities and residential options that are affordable.
3 Parking	The current Land Use Bylaw includes minimum visitor parking requirements for townhouse and multiple dwellings, as well as on-site parking for secondary suites and garden suites.	Reduce on-site parking requirements for more affordable dwelling types.	Creates cost savings that can be passed onto consumers or clients and can provide new opportunities for more affordable housing types.
4 Amenity Space	The current Land Use Bylaw requires both common and private amenity space to be provided for multi-family dwellings including townhouses, multiple dwellings and apartments on a planned site.	Increase flexibility within amenity space regulation.	Allows affordable housing providers to meet a range of needs and preferences as they see appropriate for their development and potentially create cost savings that can be passed onto consumers or clients.

# 1. Supportive and Affordable Housing Related Uses

## 1.1 Summary of Findings

Existing County regulation includes a number of similar residential uses related to supportive and affordable housing. Often these uses are defined not by their form, but by the intended user. Given the existing overlap between the definitions, many of these existing uses are not currently used, as they are interchangeable.

Differentiating between these uses results in regulating the user, rather than the land use. This type of regulation may perpetuate “stigma” regarding the user, where the land use itself may be identical to that surrounding it. Also, having a number of similar types of uses can cause confusion over the most appropriate use. Inconsistently listing these uses as permitted versus discretionary across similar types of zoning districts can restrict the development opportunities for these types of uses inadvertently.

A review of other municipalities showed that the City of Edmonton passed a bylaw in 2020, where a supportive housing use replaced similar uses. The City of Edmonton also added supportive housing as a listed use across several commercial and urban service zones.

## 1.2 Proposed Solutions

To reduce stigma driven land use conflicts, increase clarity and work towards regulating the land use, rather than the user, the County can reduce these overlapping uses by replacing them with one generalized use, such as assisted living facility or supportive housing, separated into a major and minor form.

The County can provide more opportunities for either an assisted living facility or supportive housing use by adding the new generalized use as a listed use to zoning districts where similar forms of structures are already considered.

These proposed solutions are intended to increase opportunities for residential options that are affordable.

Should Council direct administration to move forward with a bylaw to reduce the current supportive and affordable housing related uses to a generalized use, such as assisted living facility or supportive housing, and increase opportunities for this use across zoning districts, the following table outlines the amendments that would be pursued:

Table 2: Supportive and Affordable Housing Related Uses Proposed Amendments

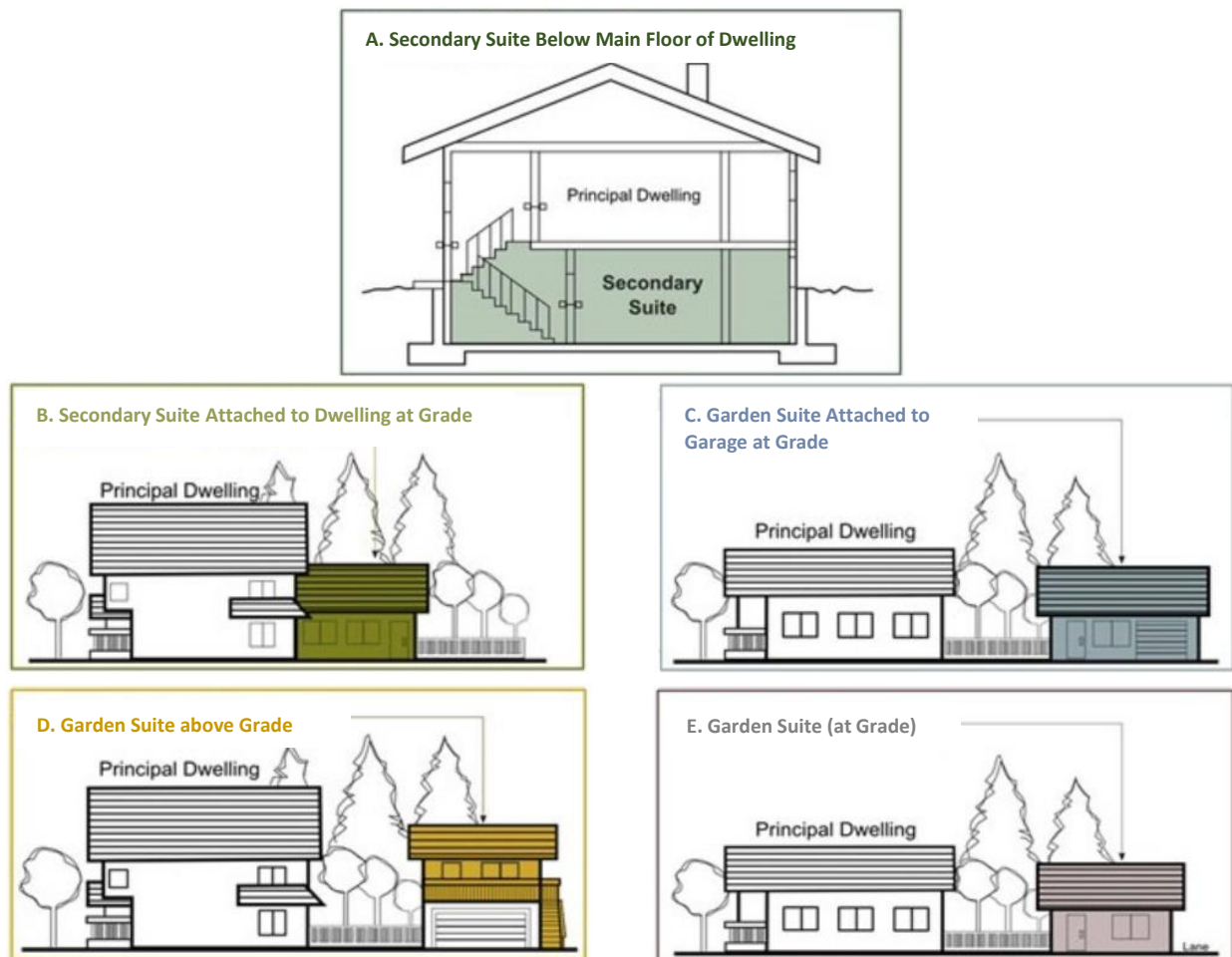
ITEM	EXISTING REGULATIONS	PROPOSED AMENDMENTS	INTENT
1 Existing Terms	The current Land Use Bylaw includes a number of similar residential uses related to supportive and affordable housing that tend to overlap.	Replace the existing overlapping supportive and affordable housing related uses with one generalized use, such as assisted living facility or supportive housing, separated into a major and minor form.	This proposed amendment is intended to shift from regulating the user to regulating the land use. Reducing the number of uses is intended to result in more clarity.
2 Expanded Opportunities	The current Land Use Bylaw inconsistently lists supportive and affordable housing related uses across similar types of zoning districts.	Add new generalized use into additional districts where similar forms of structures are already considered.	This proposed amendment is intended to result in increased opportunities for the development of supportive and affordable housing related uses.

## 2. Secondary Suites and Garden Suites

### 2.1 Summary of Findings

Secondary suites and garden suites are an important form of affordable rentals that can offer a gentle integration of density and diversity into existing low-density areas. This form of intensification can often be achieved with little to no impact to the surrounding community and can help to repopulate communities seeing population loss due to a homogenous housing stock.

Secondary suites and garden suites typically take the following forms:



Source: [www.markham.ca](http://www.markham.ca)

In 2008, secondary suites were added as a use to the Land Use Bylaw. At the time, the definition of secondary suites included what is commonly known as garden suites. In 2015, updates were made to the Land Use Bylaw to expand opportunities for secondary suites, and the definition was altered to separate out garden suites as its own use. Secondary suites were changed from discretionary to permitted across rural residential zoning districts and within two low density urban zoning districts. From May 31, 2008 to May 30, 2015, 116 secondary suite development permits



were issued, which is approximately 17 development permits issued yearly over a seven year period. From May 31, 2015, to present, 171 development permits were issued for secondary suites and garden suites, which is approximately 24 development permits issued yearly over an approximate seven-year period. As a result of these updates, there was an average increase of approximately seven secondary suite and garden suite developments permits issued yearly or an increase of approximately 30% yearly.

Secondary suites and garden suites are listed uses across rural residential zoning districts, except garden suites are not a listed use within the hamlet zoning district.

Secondary suites are a listed use in some urban low-density residential zoning districts, while garden suites are further limited to urban residential zoning districts within areas including Hillshire and Cambrian East.

Further, secondary suites are limited to single detached dwellings. As identified in the definitions for the following dwelling types, secondary suites cannot be accommodated in a duplex, multiple dwelling, or semi-detached dwelling.

These regulations are restrictive, result in limited opportunities for secondary suites and garden suites within the County and reduce the ability to diversify the County's available rental options.

A review of the City of Edmonton regulations showed that Edmonton allows for garden suites and secondary suites across the majority of their residential zoning districts and where located within or on a parcel with a variety of dwelling forms.

In July 2017, the Edmonton City Council approved expanded opportunities for garden suites. These expanded opportunities resulted in little to no change in the number of applications approved per year.

In August 2018, the Edmonton City Council approved expanded opportunities for secondary suites. There was a significant increase in applications approved in the year directly following regulation changes, but rates stabilized the following year, with only slightly increased rates of applications approved.

The City of Calgary allows for secondary suites in single detached dwellings, semi-detached dwellings and rowhouse buildings. Backyard suites are allowed within single detached dwellings, semi-detached dwellings and rowhouse buildings, specifically within residential low density mixed housing zoning districts.

The City of Leduc allows for secondary suites in duplexes and townhouses as a discretionary use, specifically within the Infill Overlay. Garage suites are allowed to be accessory to a building in which the principal use is a single detached dwelling or a duplex side-by-side dwelling.

A review of other regional municipalities identified that secondary suites and garden suites are often limited to single family homes. Secondary suites and garden suites

are generally listed uses across low density residential zoning districts, with secondary suites listed as a permitted use, and garden suites listed as a discretionary use.

## 2.2 Proposed Solutions

The County can create increased opportunities for residential options that are affordable and a diversity of dwelling types for people of all ages, incomes and abilities by allowing additional opportunities for secondary suites and garden suites.

Should Council direct administration to move forward with a bylaw to increase the opportunities for secondary suites and garden suites within the County's Land Use Bylaw regulations, the following table outlines the amendments that would be pursued:

Table 3: Secondary Suites and Garden Suites Proposed Amendments			
ITEM	EXISTING REGULATIONS	PROPOSED AMENDMENTS	INTENT
1 Definitions	The current Land Use Bylaw definitions limit secondary suites to single detached dwellings.	Update the definitions for semi-detached and townhouse dwellings to allow for secondary suites.  Update the definition for secondary suite to allow for secondary suites to be located within semi-detached and townhouse dwellings.	This proposed amendment would allow for the consideration of secondary suites in housing forms other than single detached dwellings, increasing opportunities for secondary suites, which could result in greater housing diversity and residential options that are affordable.
2 Secondary Suite Use	The current Land Use Bylaw only considers secondary suites within a limited number of zoning districts.	Throughout the Urban Service Area and Hamlets, add secondary suites to residential districts as a permitted or discretionary use where located within a dwelling type that is already permitted or discretionary.	This proposed amendment would increase the amount of zoning districts where secondary suites could be considered, which could result in greater housing diversity and residential options that are affordable. Secondary suites can provide an important housing form for families wishing to provide separate living quarters for semi-independent children or parents.

3 Types of Garden Suites	The current Land Use Bylaw has one general garden suite use for both rural and urban areas.	Separate garden suites into garden suites, urban and garden suites, rural.	Urban and rural structures can take significantly different forms and require separate regulations for clarity and appropriate, context specific regulations. For example, larger sizes of garden suites may be considered in the Rural Service Area than in the Urban Service Area.
4 Garden Suite Use	Within the current Land Use Bylaw, garden suites are well represented in rural residential zoning districts but are not listed in hamlets and can only be considered in a limited number of Urban Service Area zoning districts.	Add garden suites, urban as a discretionary use within lower density residential zoning districts within hamlets and the Urban Service Area, with the addition of specific use regulations.	These proposed amendments would increase the amount of zoning districts where such a use could be considered within the Urban Service Area and hamlets, which can result in greater housing diversity and residential options that are affordable. Garden suites can provide an important housing form for families wishing to provide separate living quarters for semi-independent children or parents.

## 3. Parking

### 3.1 Summary of Findings

Existing County regulation includes minimum parking requirements for the majority of uses. Requiring a minimum amount of parking spaces can be restrictive and result in increased costs for development and residents without necessarily providing an increased benefit.

A review of other regional municipalities showed that some municipalities regulations allowed for increased flexibility in parking space requirements. The City of Edmonton removed all minimum on-site parking requirements in 2020. Removing parking requirements hasn't led to dramatic change but has allowed for minimal-parking developments and made it easier for homeowners and businesses to use parking-stall space for other purposes. The majority of developments continue to provide parking. The City of Calgary has removed minimum parking requirements across the City for commercial uses. Other municipalities have relaxed parking requirements under certain circumstances, such as where a development is located within a mixed-use urban area, in close proximity to transit, or where parking studies have been completed, justifying reductions in parking.

Minimum parking requirements are often ineffective at matching supply and demand for parking spaces, resulting in an oversupply of on-site parking, therefore some municipalities have removed parking requirements, and allow the market to dictate the amount of parking provided. Following the removal of parking requirements, practice has shown that developers typically still provide parking based on market demand.

### 3.2 Proposed Solutions

The County can create greater flexibility for developers, landowners and affordable housing providers by increasing flexibility within parking regulation. Allowing for reductions in parking requirements is intended to reduce costs for residential options that are affordable by creating cost savings that can be passed on to consumers or clients.

Current parking regulation can create unnecessary expenses for more affordable housing forms such as secondary suites, garden suites and townhouses. Decreasing parking regulation for these specific housing forms can create new opportunities for construction that were previously limited by parking regulations. These focused changes align with trends towards market-based parking approaches.

Should Council direct administration to move forward with a bylaw to increase the flexibility of the County's parking regulations, the following table outlines the amendments that would be pursued:

Table 4: Parking Proposed Amendments

ITEM	EXISTING REGULATIONS	PROPOSED AMENDMENTS	INTENT
1 Visitor Parking	The current Land Use Bylaw requires visitor parking for townhouses and multiple dwellings in addition to the required primary dwelling parking spaces.	Remove visitor parking requirements for townhouses and multiple dwellings.	<p>This proposed amendment is intended to allow developers and affordable housing providers flexibility to determine whether they require visitor parking for their townhouse or multiple dwelling development, or the appropriate amount of visitor parking for their townhouse or multiple dwelling development and could result in decreased costs.</p> <p>A minimum of two parking spaces would still be required per dwelling unit. Removing the minimum visitor parking requirements for townhouse and multiple dwellings would align them with the existing single, semi-detached, and duplex dwelling parking regulations.</p>
2 Secondary Suites and Garden Suites	The current Land Use Bylaw requires on-site parking for secondary suites and garden suites in addition to required primary dwelling parking spaces.	Remove the requirements for an on-site parking space for secondary suites and garden suites.	<p>This proposed amendment would allow for secondary suite and garden suite development without designated on-site parking.</p> <p>Tenants could potentially utilize existing parking for the principle dwelling and/or available on-street parking.</p> <p>This would result in reduced costs and barriers for landowners looking to develop secondary suites and garden suites on their properties to rent or for extended family.</p> <p>This would also bring parking regulations for secondary suites and garden suites in line with larger municipalities in Alberta, creating a more competitive market for such forms.</p>

## 4. Amenity Space

### 4.1 Summary of Findings

Existing County regulation requires both common and private amenity space to be provided for multi-family dwellings including townhouses, multiple dwellings and apartments on a planned site.

Common amenity space refers to indoor and outdoor space that is designed for active or passive recreational uses provided for the use of all occupants of a development.

Private amenity space refers to a space in the form of a deck, patio or balcony which is located within or adjacent to a dwelling unit and that is provided for the exclusive use of that dwelling unit.

**Indoor Common Amenity Space**



**Outdoor Common Amenity Space**



**Private Amenity Space**



Requiring both common amenity space and private amenity space can be restrictive and result in increased costs for development without necessarily providing an increased benefit.

A review of other regional municipalities showed that some municipalities regulations allowed for increased flexibility in the provision of amenity space. Municipalities including the City of Edmonton, City of Calgary and Leduc County allowed amenity space to be provided as either private, common, or a combination of both.

### 4.2 Proposed Solutions

The County can create greater flexibility for developers and affordable housing providers by increasing flexibility within amenity space regulation. This will allow them to meet a range of needs and preferences as they see appropriate for their development. These proposed solutions are intended to reduce costs for residential options that are affordable by creating cost savings that can be passed on to consumers or clients.

Should Council direct administration to move forward with a bylaw to increase the flexibility of the County's amenity space regulations, the following table outlines the amendments that would be pursued:

Table 5: Amenity Space Proposed Amendments			
ITEM	EXISTING REGULATIONS	PROPOSED AMENDMENTS	INTENT
1 Common Amenity Space Use	The current Land Use Bylaw has one general definition for common amenity space.	<p>Separate Common Amenity Space into two types: Common Amenity Space, Indoors and Common Amenity Space, Outdoors.</p> <p>Common Amenity Space, Indoors could include spaces such as: fitness areas, indoor pools, party rooms, pet areas, libraries, billiard rooms, or children's play areas.</p> <p>Common Amenity Space, Outdoors could include spaces such as: playgrounds, outdoor pools, courtyards, tennis courts, or rooftop greenspaces and patios.</p>	This proposed amendment is intended to separate common amenity space into indoors and outdoors, to provide greater clarity between different types of common amenity spaces.
2 Amenity Space Uses	The current Land Use Bylaw requires both common and private amenity space to be provided for townhouses, multiple dwellings and apartments.	Remove the requirement for both private amenity space and common amenity space, and instead allow for either private amenity space, common amenity space, indoors, common amenity space, outdoors, or a combination.	This proposed amendment is intended to allow flexibility for the developer to decide what type of amenity space is most valuable for their development, as the situation and market for such structures may vary.

3 Minimum Requirements	Under the current Land Use Bylaw, variations in amenity space are not currently tied to a specific number of units.	Require a minimum of two types of amenity spaces (private amenity space, common amenity space, outdoors, or, common amenity space, indoors) where there are more than 20 dwelling units.	This proposed amendment ensures that sufficient diversity of amenity spaces is provided for higher density developments.
4 Proximity to public amenity space	<p>The current Land Use Bylaw requires a minimum of 3.5m<sup>2</sup> of amenity space per dwelling unit. Private amenity space shall be a minimum of 1.5m<sup>2</sup> per dwelling unit.</p> <p>Regulation does not consider proximity to parks and open space.</p>	Allow for consideration of a reduction to the minimum amenity space requirements for developments proposed within close proximity to a public amenity space, such as a public park.	This proposed amendment would allow for reduced amenity space requirements where a development has substantive access to public amenity spaces as an alternative.



## 5. Stakeholder Engagement

Administration presented information on the Affordability of Housing – Red Tape Reduction Report to the Strathcona County Community Living Advisory Committee on November 24, 2022, and to the Seniors Advisory Committee on December 8, 2022. The Advisory Committees were provided an overview of the red tape reduction options and given the opportunity to provide comments and feedback. The Advisory Committee's reiterated the need for more diversity and more affordable residential options within the County.

The Affordability of Housing – Red Tape Reduction Report was shared with Heartland Housing Foundation for their review and feedback. Heartland Housing Foundation provided the following statement of support:

"Having reviewed the Affordability of Housing – Red Tape Reduction Report, Heartland Housing Foundation is happy to offer this letter of support for the report and the work it details.

We appreciate the opportunity we had to participate in the consultation process leading to the development of this report and are encouraged by the recommendations it presents.

As the region's housing management body, we strongly support any action by the municipalities we serve to enable diversity in housing choice, specifically as it supports lower-income residents with accessing safe, affordable housing in the community of their choosing."