

Summary of Issues and Concerns –
Proposed Bylaw 14750 (Secondary and Garage Suites)

The following discusses support and concerns raised during the public input, public involvement and circulation processes, as well as changes made to the Bylaw after circulation, and estimates of the potential number of Secondary Suites that may be developed as a result of this Bylaw. See also Background #2 "Non-statutory Public Hearing Summary" (June 13, 2007) and Background #3 "Open House Summary of Responses" which highlight other input received. Attachment 3 to the December 12, 2007 Public Hearing Report, 2007PDP551, highlights some of the changes that were done to the Bylaw as a result of concerns expressed.

1. Support for Secondary Suites.

Input received from the real estate and development industry, housing advocates as well as the University of Alberta Student's Union, along with most interested members of the community showed strong support for secondary suites generally, including increasing the opportunity throughout the City.

Generally, Secondary Suites and Garage Suites are seen as a way to assist homeowners as "mortgage helpers" within a market that has seen extreme price increases for single detached housing (approximately 75% increase over the 1 ½ year period of 2006 to mid-2007). They are also seen as a relatively fast way to increase the supply of affordable rental housing throughout the City. They can increase the diversity of people in any one community and can assist seniors so that they can remain in their homes. At the non-statutory Public Hearing, the Real Estate Association of Edmonton stated that relative to the cost to develop other forms of rental housing, the typical costs to renovating existing basement suites to meet new (Fire Code) standards (approximately \$10,000-\$15,000) is roughly 10% the cost of building a single new subsidized rental unit (about \$150,000).

The two surveys by Banister Research showed similar levels of support for secondary suites: Two-thirds overall (66%) of respondents in the random survey (out of 402 respondents), and 67% of respondents in the on-line survey (out of 46 respondents) agree or strongly agree that providing increased support and opportunities for creating new suites will provide affordable, safe housing within the City of Edmonton. The results of the random survey and on-line surveys are available at www.edmonton.ca/secondariesuites, under "Background on Secondary Suites".

55% of the 320 homeowner respondents in the random survey and 52% of the 42 homeowner respondents in the on-line survey indicated that they supported the development of secondary suites, either by themselves or within their community.

2. Phased Approach

Most of those who responded to the questionnaire at the September 2007 open houses (13 of 16 who did) support a phased approach to Zoning Bylaw Amendments to increase the opportunity for secondary and garage suites.

While there was support for a phased approach, 6 out of the 16 respondents to the questionnaire at the open houses indicated concerns that a phased approach may be too limiting. Some suggestions included adding in over-sized or pie-shaped lots to those candidate lots that meet the locational requirements (where required in Phase 1 in the RF2 and RF2 zones), and others indicated that Phase 1 is very limited. Two comments indicated that the phasing needs to be timed to meet the demand for housing.

A significant portion of those who spoke with Staff in attendance at the open houses are interested in developing Secondary or Garage Suites. Given that the RF1 Zone is by far the most predominant single detached housing zone in the City, it was not surprising that most who attended the open houses and who are interested in developing secondary and garage suites are RF1 lot owners. However, as with those who have made telephone inquiries to the Zoning Bylaw Implementation Section and the Development Compliance Branch, most of these RF1 lot owners will not be able to develop secondary suites in Phase 1 due to the locational restrictions, even though they are much less limiting than the current restrictions that apply to the RF1, RF2 and RF3 (for permitted secondary suites) zones. While there is support for a phased approach, there is some expectation on behalf of these lot owners that the opportunity will increase to include all lots zoned RF1 (and RF2) in Phase 2.

3. Owner occupancy requirement

The issue of owner occupancy and reasons why some members of the public and some community league representatives support such a requirement (concerns regarding property maintenance and tenant behaviour) was discussed in Attachment 3 of the December 12, 2007 Public Hearing Report 2007PDP551. This section further discusses the input received on this issue.

An owner occupancy requirement for secondary suites and garage suites has a relatively high degree of support, however the random survey conducted in June 2007 (by Banister Consulting) showed a divided response.

The Edmonton Federation of Community Leagues (EFCL), in a two part motion, has stated that it supports an owner occupancy requirement as well keeping the use opportunity for secondary suites as a discretionary, rather than permitted, use (June 27, 2007). This view was presented to the Executive Committee on July 11, 2007.

Two out of three community league groups (Central Area Council of Community Leagues and the and Belgravia Community Association), as well as the Realtor's Association of Edmonton, in submissions to June 13, 2007 non-statutory Public Hearing, stated that they support for secondary suites provided that the properties be owner occupied. The Central Area Council represents the Allendale, Belgravia, Empire Park, Garneau, Lendrum, McKernan, Parkallen, Pleasantview, Queen Alexandra, Rosedale, Strathcona Centre, and Windsor Park community leagues.

At the non-statutory Public Hearing on June 13, 6/9 of the presenters who responded to a "straw vote" indicated that they preferred an owner occupied requirement.

The random survey showed a split, with 45% of respondents (unaided responses) agreeing to an owner-occupancy requirement, with 41% disagreeing with such a requirement. The on-line (voluntary) survey showed similar results: 48.6% (18) of those who indicated there should be rules (37/46 respondents) agreed that there should be an owner occupancy requirement.

4. Discretionary or Permitted Use

The proposed Bylaw proposes that where the opportunity for Secondary Suites is to be allowed, it be allowed on a Permitted, rather than Discretionary, basis (excepting the case where the opportunity is already Discretionary, and is being carried forward in case of the RF3 Zone in Phase 1). Garage Suites, due to their higher impact, are proposed to be Discretionary uses.

During the non-statutory Public Hearing (June 13) and the three public open houses (September) the issue of allowing Secondary Suites on a Discretionary basis, as the current Bylaw allows, on a limited basis (excepting the RF3 Zone where lots meet limiting locational criteria) was discussed. A number of residents of mature neighbourhoods have indicated the preference for Secondary Suites to continue to be a discretionary use (three submissions to the non-statutory hearing included such a preference). The EFCL's position presented to the Executive Committee on July 11, 2007 specifies that the opportunity should remain as a discretionary use.

The concerns expressed regarding the proposal to increase the opportunity to a permitted use include:

- There are no limits specified on the potential numbers of Secondary Suites

- Concerns over on-street parking congestion
- Worry that Secondary Suites will be over-concentrated in some neighbourhoods
- Concerns over tenant behaviour

Staff have continued to support expanding Secondary Suite opportunities on a Permitted basis, provided that other criteria are met, including minimum lot size, on-site parking, separate entrance, and minimum and maximum floor area of Secondary and Garage Suites. A review of Zoning Bylaws in Canada shows that most Bylaws provide for secondary suites on a permitted, rather than discretionary basis (including, for example, St. Albert).

As for potential increases in the numbers of suites in individual neighbourhoods, typically between 10-20% of single family homes will have secondary suites, with or without regulations to accommodate them (CMHC. *Accessory Apartments: Characteristics, Issues, Opportunities*, 1990). There are exceptions, such as areas near post-secondary institutions, where uptake is typically higher, however, parking requirements are typically also lower in these areas.

The Development Permit process for Permitted Uses is substantially easier for both the applicant and Staff due to shorter timelines and without the need for permit application notification. Given the limited overall impact of Secondary Suites on neighbourhood character, and the relatively low uptake on the Use opportunity, Staff prefer to expand the opportunity on a Permitted basis, provided the key criteria is met.

In the Discretionary context, typically there would be a higher number of new illegal secondary suites, due to reluctance on the part of potential Secondary Suite developers due to go through the Discretionary Development Permit application process. The granting of discretionary permits can be held up substantially and those interested in developing Secondary Suite may be discouraged from seeking permits due to the required notification process and also the potential for appeal by neighbours through the Subdivision and Development Appeal Board (SDAB).

5. Privacy Regulations for Garage Suites

At the open houses, there were relatively more concerns expressed about the potential negative impacts of Garage Suites as opposed to Secondary Suites, which are typically developed in the basement (in Phase 1 garage suites proposed only for the second storey above a detached garage). Concerns included:

- they are seen as invasive, with potential impacts on the privacy of neighbouring back yards depending on the location of windows;

- They are not seen as being compatible with the character of single detached neighbourhoods,
- maximum allowable height, which had been proposed to be 6 m.

As a result of the concerns expressed, the Bylaw has been amended to include revisions to add more specific requirements to address the privacy of neighbouring properties. These changes are discussed in Attachment 3 of the December 12, 2007 Public Hearing Report 2007PDP551

6. Control of Number and Location of Secondary and Garage Suites

Some community members are concerned about the potential number of secondary suites in their neighbourhoods, including potential impacts on neighbourhood character and on-street parking congestion (particularly where the opportunity is currently very limited, e.g. areas zoned RF1). The Belgravia Community League, which has considerable demand for secondary suites due to its proximity to the University, stated, at the June 13 Public Hearing, and in their written submission, that there should be limits to the number of suites per neighbourhood, block and area. The Central Area Council of Community Leagues similarly, in their written submission, has concerns on the potential number of suites within a single community. The Parkallen Community Association similarly stated that the city needs to take into consideration the housing mix and base density level of neighbourhoods when considering secondary suites.

A general analysis of the typical uptake of secondary suites in Canadian municipalities shows that it is limited. Further, the restrictions in Phase 1 in the RF1 and RF2 Zones, along with other limitations in the other zones will limit the number of potential suites (refer to "Background Information Available on Request" #4, "Opportunity and Uptake of Secondary Suites" with Zoning Bylaw Amendments", cited in the December 12, 2007 Public Hearing Report 2007PDP551.

7. Parking

The proposed Bylaw maintains the requirement of at least one on-site parking space within lots that have a secondary or garage suite, in addition to the requirements for the Single Detached home (minimum 3 on-site parking spaces in total).

Most feedback obtained emphasized the need to accommodate on-site parking for Secondary Suites. In the random survey, the need for on-site parking received the highest level of support of any one regulation for secondary suites, with 74% supporting this requirement (see top line results of the random survey, available at www.edmonton.ca/secondariesuites, under "Background on Secondary Suites" for a summary of support for various regulations). However,

there have been concerns from some community league members that requiring extra on-site parking could have a detrimental effect on residential properties, through pressure to remove landscaping, and negative impacts on the appearance of yard spaces where extra parking spaces may be developed.

The Belgravia Community League, in a letter (September 26, 2006), and the Central Area of Community Leagues, in their written submission to the June 13, 2007 non-statutory Public Hearing, both stated that parking requirements will vary depending on property location and street conditions. The Central Area of Community Leagues has a concern about the potential for unnecessary paving of yard to accommodate additional parking spaces, but also does not want neighbourhood streets to become parking lots. The Belgravia Community League notes that certain types of tenants will not necessarily require parking.

8. Strathcona County Response

Strathcona County initially submitted a letter dated September 24, 2007 opposing the Bylaw as circulated:

“Strathcona County does not support Bylaw 14750 since it proposes residential intensification within an unsafe distance from heavy industrial land uses within the City”.

Strathcona County further requested mediation prior to second reading and reserves the right to appeal the bylaw, as per Section 690 of the Municipal Government Act.

As a result of Strathcona County's concern, Staff prepared a revision to the Bylaw, which includes an overlay that includes the Edmonton- Strathcona County-Joint Planning Area (1.5 km wide buffer within the City of Edmonton along the Strathcona County-Edmonton boundary). The “Edmonton- Strathcona County-Joint Planning Area Secondary and Garage Suites Overlay” (Section 822 of the Zoning Bylaw, Schedule “A” to proposed Bylaw 14750, Attachment 1 to the December 12, 2007 Public Hearing Report 2007PDP551). The overlay will limit Secondary Suites by not increasing the opportunity within this area (but the opportunity under existing regulations will be retained). The overlay affects the following neighbourhoods in the Southeast and the Northeast parts of the City: the Meadows, Gold Bar, Maple Ridge Mobile Home Park, Beverley Heights, Rundle Heights, Abbotsfield and Cannon Ridge. Once the joint planning area is further refined, amendments to the Zoning Bylaw to lift restrictions in this area, as appropriate, could be initiated.

As a result of the revision to the proposed Bylaw, Strathcona County submitted a second letter dated November 13, 2007, indicating that it no longer has concerns with the proposed Bylaw:

"We are satisfied that no new residential intensification will occur as a result of the proposed Bylaw 14750 within 1.5 km of heavy industrial land uses within Strathcona County, beyond what is currently allowed within the City's Zoning Bylaw."

Non-Statutory Public Hearing Summary – JUNE 13, 2007 Executive Committee
Secondary and Garage Suites – Zoning Bylaw Amendments

1. Administration's Presentation
"Secondary Suites: Zoning Bylaw Options" Report 2007PDP132

Purpose: discuss and review potential changes to the zoning by-law to increase the opportunity for new suites:

Potential changes to the Zoning Bylaw to increase opportunities for:

- new suites in new development (green field or infill)
- new suites in existing development
- Legalizing existing suites in existing development

2. Speakers and Stakeholder Presentations

Canadian Homebuilders Association (represented by Peter Jackson – past president)

- supports secondary suite initiative – many benefits of secondary suites to homeowners and renters
- Many municipalities including: Saskatoon, Toronto, North Vancouver and more have permitted active secondary suite programs for a minimum of 5 years,

Issues/concerns these cities have to address are NOT a problem to manage with innovative strategies. These issues include:

- city has no control over whether they use the required parking spaces
- legal suites must provide parking on site: can be achieved by allowing parking in tandem and access to transit
- impact on built form: selling homes with sec suite: selling feature generally raise property values upon resale
- existing illegal suites decommissioning these could result in many people losing their homes however the Building codes is in place to ensure health and safety
- some municipalities have development permit postings on homes so that neighbours can see legal action is taking place
- grandfathering in existing suites: education will be very important
- estimated cost to develop: for example, an average full basement development by a professional builder or contractor in an existing home is 20,000-30,000 dollars; 35-40 dollars/foot, cost is also affected by the finishing
- suite ready options: rough-in plumbing and wiring: city quoted 3,000 dollars, survey of our membership was approx 7,000 dollars depending on requirements
- would not want to require every house for suite readiness

**Edmonton Realtors Association (represented by Carolyn Pratt, President)
(presentation and written submission)**

- where building codes or zoning regulations have prevented the existence of - secondary suites, home owners and realtors were forced to use euphemisms and vague terms to disguise the true nature of the additional development of the home
- have heard there are some 10,000 secondary suites throughout the City
- Is it reasonable to expect another 10,000 suites might emerge from 151,000 single family homes in Edmonton? That's 50 times better than the 200 affordable housing units that the city built in 2006
- Secondary suites are an immediate and low cost way to provide more affordable housing.
- Will provide options for young people, newcomers to the City, and provide a "mortgage Booster" to new homeowners
- estimated cost of renovating a secondary suite to meet the new standards is about \$10,000 to \$15,000, versus about \$150,000 for the development of a subsidized affordable housing unit.
- Our position is that secondary suites should be allowed in all new or existing owner occupied single family residences in all parts of the city when they meet appropriate standards to protect the health and safety of the homeowner and the tenants
- North Vancouver experience is proof that there is negligible change to a community when secondary suites are allowed

Belgravia Community League (represented by Gwen Berdan)

- In general we support the development of guidelines to allow limited development of secondary suites in Belgravia
- To preserve the integrity of the neighbourhood as well as the safety of the tenants we need to see the following:
 - o owner occupied
 - o enforcement
 - o city is responsible for ensuring new and existing suites are developed to code
 - o city is responsible to ensure the proper permits are taken out
 - o city need to manage and set limits to the number of suites per neighbourhood, block and area
 - o one suite per dwelling
 - o we don't believe the city needs to actively promote sec suites in Belgravia however does need to consult neighbourhoods like ours when developing the zoning bylaw changes
 - o we do not insist on off street parking as our density is low

Nancy Rempel:

- Neighbour of a secondary suite
- Has issues with the tenant of the suite – smoking outside ;coughing; fumes; litter; traffic people and cars ; parking

- wants the following:
 - o sec suite owners to show their permits when asked
 - o community minded contract between landlord and tenant
 - o when landlord says something is not allowed in the suite it should not be allowed in the yard either (smoking)

Central Area Council of Community Leagues (represented by Sandra Guilbert, President)

"Community leagues need more notice to participate effectively in matters such as this that directly effect their neighbourhoods and community leagues cannot be expected to welcome this initiative without adequate input, without assurance that their suggestions have been considered, and without adequate efforts by the city to address impacts that may arise from the imitative."

Margaret Oseen

- believes what city is doing is visionary: enhance social connectivity
- Would like to see parking restrictions- many people can take the bus

Michael Mooney (Urban Development Institute)

- Will echo much of what Peter Jackson and Carolyn Pratt had brought forward
- UDI supports sec suites
- Recommends simple zoning by-law amendment to allow all secondary suites in all residential and commercial zones
- Look to the other cities we have been discussing...very low impacts
- Get the suites on the market and then work with enforcement before the election

University of Alberta Students Union (represented by Steve Dollansky - presentation and written submission)

- represents over 30,000 undergraduate students
- vacancy rates the lowest in university area
- a significant number of students live in secondary suites no real numbers b/c many are illegal
- critical housing form for students
- happy to hear about provincial changes to codes but are still concerned that many students are living in suites that may pose health and safety issues
- issues unlikely to be addressed unless there is movement from the city to formalize secondary suites as a permitted use and aggressively seek code compliance,
- urge the city to consider offering landlords rebate incentives, financing assistance and limited amnesty to help bring existing non-conforming suites up to code
- urges the city to expedite the implementation of secondary suite policy with the view to this fall looming back to school housing crunch

Miss. Orleski

- renter for over 30years
- describes poor conditions and poor landlord treatment

- would like to see the building and safety codes addressed in all suites

Dwayne Wladyka

- suggests municipal or provincial incentives to help the home owner with costs to bring the suites legal to code without cost to the tenant
- stringent rules and regulations must be enforced in regards to safety

3. Key topics of discussion

- Permitted vs. Discretionary
- Owner Occupancy (in a "straw vote", 6/9 of the presenters who responded support owner occupancy requirement)
- Built Form
- Timing of the initiative
- Illegal suites
- Enforcement
- Building and Safety Codes
- Suite readiness
- Cost to build
- Mixed residential-commercial use
- Amnesty options
- Locational criteria
- Incentives
- Suburbs vs. Mature areas
- Phasing approach
- Controls for suite development

4. Documents Submitted to Clerk's Office

Edmonton Realtor's Association (Carolyn Pratt, President) (script read at hearing)

University of Alberta Student's Union (Steven Dollansky) (report submitted the day of hearing)

Central Area Council of Community Leagues (Sandra Guilbert, President) (post non-stat hearing submission)

- Secondary suites will benefit the community if they are owner occupied
- restrict to RF1 and RSL zones, that is, restrict to single detached housing and do not allow within semi-detached, up-down duplex, or row housing
- fear taller garages and garden suites negatively impact neighbours
- suite size should be smaller than main owner-occupied – concerned about total number of potential tenants in one suite
- secondary suites will help diversity of people buy homes in neighbourhoods and will help seniors remain in their homes
- parking: do not want regulations to result in unnecessary paving of yards
- concern of total number of suites and placement of in a single community

- proper permits need to be in place and suites need to be inspected to ensure they are safe for tenants

Linda Kokotailo (email)

- former neighbour of a secondary suite
- not in favour of secondary suites in her neighbourhood
- concerns included cross-cutting through her property and tenant vehicles parked in front of her house

Parkallen Community Association (Deena Hinshaw and Karsten Mundel)

- Support secondary suite initiative
- Take into account the base density and mix of housing in a neighbourhood when considering secondary suites
- Limit suites to RF1 and RPL zones
- One suite per unit
- Essential for all secondary suites to have both development and building permits
- All suites should comply with fire regulations

Allan Tchida

- has no formal position
- discretionary approval for temporary permits
- fear of absentee landlords – worst case scenario where uncaring landlords are broadly permitted to overrun neighbourhoods with poorly maintained revenue properties
- acknowledges no formal enforceable regulation for owner-occupancy
- secondary suite occupants-need to study this demographic
- study of administration costs needed
- study of illegal suites needs to be done
- suite readiness requirements in new construction is very costly – such requirements should be approved by the development officer on a discretionary basis only
- neighbourhood plans should be mindful of any decision on secondary suites that may result in a concentration of secondary suites in any one neighbourhood. Such plans should be developed with smart growth ideals which would include secondary suites land uses

SECONDARY & GARAGE SUITES - SUMMARY OF COMMENT SHEETS

Open Houses: Sept 13, 18 and 20, 2007

16 RESPONSES TOTAL

Total signed-in attendance: 37

Total estimated attendance: 60

Comment/Subject	Number of Responses
PROMPTED QUESTIONS	
“Do you agree with a phased approach for Zoning Bylaw Amendments to increase the opportunities for Secondary and Garage Suites?”	YES = 13/16 YES to Sec Suites & NO to Garage Suites=1/16 TOO SLOW = 1/16 NO ANS = 2/16
“I found the Open House to be:”	Informative 10/16 Fairly Informative 5/16 Not Informative 0 No response 1
UN-PROMPTED RESPONSES Responses to “Do you agree with the proposed changes to the Zoning Bylaw for Phase 1?” And “Other comments” (un-prompted comments).	
Phasing – concerns/comments on the limitations in Phase 1 - detailed comments below: <ul style="list-style-type: none"> • There are some situations where a house/lot fits all the requirements and yet is located in the wrong zone (in Phase 1). These situations should be looked at separately (1/6) • Perhaps other lots (e.g. pie lots, over-sized lots that abut a triangular lane/lots near collector roadways) could be considered (reference to restrictions proposed for RF1 and RF2 in Phase 1) (1/6) • Why restriction on corner lots, etc (RF1-RF2) when parking is required on property itself (why restrictions when parking requirement accommodated)? (1/6) • Agree with Phased approach, however, with the cry for housing being an immediate concern, this will probably prove to be frustrating. (1/6) • Phases should be timed to meet demand for housing (1/6) • Phase 1 very limited. I would like have an opportunity in Phase 2 for a Secondary Suite. (1/6) 	6

Comment/Subject	Number of Responses
Phasing – other concerns/comments <ul style="list-style-type: none"> • Nothing proposed in Phase 1 should be binding on future decisions (1/3) • Don't know that something piloted in Phase 1 will be all that applicable to Phase 2 (1/3) • Phasing also allows for quality of life checks (support phased plan) (1/3) 	3
Owner Occupancy: Restrict opportunity to owner-occupied lots (i.e. Secondary Suites or Garage Suite references)	4
Garage Suite Concerns: <ul style="list-style-type: none"> • Garage Suite only acceptable if no negative impact on adjoining residents (1/4) • Concerns over height of Garage Suites (2/4) • Opposed to Garage Suites. Have Garage next door resembles suite. A leave "as-built" permit was denied (2' over height). Impacts respondent's property – privacy, overlooks back yard. Already an illegal suite within house next door as well. (1/4) • Have neighbors who are renting out their home and want to build Garage Suite as well – prefer owner occupied (1/4) 	4
Not in favour of making Secondary Suites permitted in RF1, RF2, RF3. Keep them Discretionary	1
Get rid of "Discretionary". Potential residents need to know before they purchase.	1
Required parking for Secondary Suites very good idea	1
Concern that there seems no limit to total number and placement of suites in any one community	1
Excellent idea to expand into more neighbourhoods (old & new)	1
Many advantages to better usage (of existing housing) – Many neighbourhoods new and old could accommodate suites with no disruption	1
Would like more details on CMHC RRAP Program for financial assistance	1
Are diagrams & details available for the public?	1
No reference to inspection & licensing of suites to ensure are safe for tenants	1
What is Garden Suite?	1
Why (have Garage Suites) only in the rear (detached Garage)?	1
Canmore requires all houses to have suites (Discretionary) for seasonal workers. Why not?	1

Comment/Subject	Number of Responses
Why is Building Code different for suites compared to developed basements?	1
You are thinking too small! Why not include a new type of housing that clusters dwellings together?	1
Want to have separate utility lines and meters for water, gas, electric power (for Garage Suites)	1
Pilot project invitations would be nice.	1
Hoped Open House would be speaker-driven event, usually this results in greater general understanding.	1
Go ahead!! Keep citizens informed of process	1

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Opportunity and Uptake of Secondary Suites with Zoning Bylaw Amendments

1. Phase 1 Limitations: Locational Restrictions (RF1 and RF2)

Phase 1 proposes to increase the opportunity for Secondary Suites within the RF1 and RF2 Zones (and the Permitted opportunity in the RF3 Zone) relatively less than other smaller lot Zones that more typically accommodate single detached housing in newer suburbs (RPL and RSL) through the maintenance of (more lenient) locational criteria.

2. Potential Number of Secondary Suites by Zone

The RF1 Zone, while not typically used in new single detached subdivisions, is by far the most common Low Density Zone in the City, comprising some 68% (95,990) of the total number of lots with single detached homes in the low density zones (140,390 in the RF1 through RF4 zones) (see Table 1, following page). Therefore, the greatest potential opportunity for new Secondary Suites is in the RF1 Zone.

When looking at the lot size regulation for Secondary Suites, the RF1 Zone has the largest proportion meeting it: 99.80% of lots (with and without existing Secondary Suites) with single detached housing meet this regulation (360 m2 minimum lot size). As for the other Zones, over 90% of the lots in the RF3 (96.8%) and RSL (94.3%) zones also meet the minimum lot size requirement, while over 80% of the RF2 (82.5%) and RF4 (85.12%) single detached lots also meet the locational criteria.

Phase 1 is very limited for both the RF1 and RF2 zones. Locational restrictions are proposed to be less stringent in Phase 1 than existing regulations, by opening the opportunity to include corner lots and lots along service roads. Phase 1 also allows the opportunity where lots back onto lots zoned for Row Housing, Apartment Housing, Commercial or Industrial Uses (whereas current regulations require that only the side property lines abut these lots). Nonetheless, it is estimated that only approximately 10-15% of RF1 and RF2 lots will meet the more lenient locational criteria.

As shown in columns 3 and 4 in Table 1, the number of RF1 lots expected to be able to accommodate a new Secondary Suite will be approximately 14,309 (based on 15% of the lots meeting the locational criteria), compared with a total of 95,390 RF1 lots that would otherwise meet the minimum lot size and that do not have suites according to Tax Assessment records. The RF3 Zone, in comparison, comprises a substantially smaller number of lots overall (14,834 compared with 95,990 in the RF1 Zone). The majority of lots in the RF3 Zone can

accommodate Secondary Suites: 13,963 of the remaining lots (without Suites, according to Tax Assessment records) meet the minimum lot size.

TABLE 1: POTENTIAL SECONDARY SUITES

1. Residential Low Density Lots Eligible for Secondary Suites and
2. Forecast Number Likely To Develop Secondary Suites

ZONE	TOTAL LOTS (Single Detached Housing) ¹	TOTAL LOTS MEETING MIN. SIZE CRITERIA (360 m2) ²	TOTAL LOTS MEETING SIZE & LOCATION AL CRITERIA ³	PROPORTION OF ZONE MEETING MINIMUM LOT SIZE ONLY ³	RF1 & RF2 ALSO MEETING LOCATION AL CRITERIA ³	PHASE 1: PROJECTED # SUITES (based on size & locational requirements & likely 9% uptake) ⁴	POTENTIAL MAX. #SUITES (min. lot size only; no locational criteria, based on likely 9% uptake) ⁴
RF1	95,990	95,390	14,309	99.4%	14.9%	1,288	8,585
RF2	1,923	1,488	223	77.4%	11.6%	20	134
RF3	15,343	13,963	13,963	91.0%		1,257	1,257
RF4	1,727	1,413	1,413	81.8%		127	127
RSL	16,161	15,237	15,237	94.3%		1,371	1,371
RPL	7,988	2,210	2,210	27.7%		199	199
OTHER ⁵		1,258	923	923			83
TOTAL	140,390	130,624	48,278			4,345	11,756
LOTS							
Difference:							
Lots Meeting Min. Size, But Not Locational Criteria				-82,346			

Notes:

1. Based on Tax Assessment Data: Only lots with Single Detached Homes with and without Secondary Suites (0-750 m2 lot sizes)
2. Only lots that meet both min. lot size (360 m2) & those w/o Secondary Suite as per Tax Assessment Records
3. Actual number & proportion eligible for Secondary Suites that do not currently have Suites will be slightly lower, due to number of unreported and non-conforming Secondary Suites. Proportions here are slightly lower than those that meet the lot size criteria alone (as noted on page 1) due to subtraction of the lots that have suites according to Tax Assessment records.
4. Proportion of the Zone meeting required criteria = 9% uptake (those who intend to develop a Suite) based on Random Survey (Banister Research, June 2007)
5. Includes RPLt, TSLR, TSDR & GLD zones (not GLG)

The total number of low density residential lots that would meet the minimum lot size requirement for Secondary Suites with no locational criteria requirement and that do not have existing secondary suites according to Tax Assessment Data in the RF1 and RF2 Zones is 130,624 (compared to 140,390 single detached lots in RF1 through RF4 zones) (columns 2 and 3). In this scenario, the RF1 Zone would include by far the largest proportion of eligible lots, at 73% of the total number of eligible lots within all the low density residential zones (95,390 lots).

The total number of eligible lots is be reduced by some 82,346 lots, from 130,624 to 48,278 lots, with the locational criteria requirements in RF1 and RF2 in Phase 1 of the Zoning Bylaw amendments,

3. Potential Number of Secondary Suites by Forecast Uptake Numbers

The Edmonton Realtor's Association estimates that there are at least 10,000 Secondary Suites in the City, most of them illegal. CMHC estimates that uptake of Secondary Suites, whether regulations allow them or not, is typically between 10-20% of single detached dwellings will contain suites (CMHC, *Accessory Apartments: Characteristics, Issues, Opportunities*, 1990). Expectations are that higher rates of uptake occur in cities with high house prices and low rental vacancies, which points to increasing demand for Secondary Suites within Edmonton.

Given a base line of approximately 151,000 single detached homes throughout the City of Edmonton (Edmonton Realtor's Association estimates), there could be between 15,000 and 30,000 Secondary Suites within single detached housing alone. This does not include homes with multiple suites, semi-detached dwellings and row housing which may contain Secondary Suites. Whichever estimate is taken, Secondary Suites play a significant role in providing rental housing in the City of Edmonton.

Potential uptake of the opportunity for new Secondary Suites, however, is expected not to exceed 9% of the lots currently without suites and that meet the new proposed regulations. This is based on the random survey results from the *City of Edmonton Secondary Suites General Public Survey* (June, 2007) by Banister Research (402 respondents), which showed that 9% of homeowners surveyed would consider developing a Secondary Suite (who did not already have one).

Based on a 9% estimated uptake on the opportunity, taking the number of RF1 and RF2 lots meeting minimum lot size and along the locational requirements for these zones, as well as the remaining low density residential zones that meet the minimum lot size, this translates into 4,345 new Secondary Suites, compared to 11,756 new secondary suites when no locational restrictions apply (see last two columns of Table 1 for comparison of two scenarios: no locational restrictions and locational restrictions [Phase 1]).

The two most popular zones for single detached housing in new subdivisions are RSL (with front attached garages) and RPL (rear detached or rear pad parking). Only 27% of RPL lots meet the minimum lot size requirement for Secondary Suites. The RPL opportunity is further restricted due to typical RPL site layout whereby rear detached garages tend to be developed at the minimum setback distance to rear laneways (2.75 m) which does not provide for additional tandem

parking spaces (minimum one additional on-site space is required for Secondary Suites and Garage Suites).

The RSL opportunity appears significant, given that 94.3% of RSL lots meet the minimum lot size requirements, and given that RSL front driveways can accommodate two additional parking spaces. However, practically-speaking, the potential is much less than this given current building design, whereby two-storey RSL homes typically have access to the basement through interior staircases that are not accessed via a common landing or exterior doorway. This means additional renovations would be required within most RSL homes to achieve private entry way requirements for Secondary Suites, and could discourage the uptake in this zone. Therefore, it is expected that the greatest potential for new Secondary Suites in the RSL and RPL zones will come from new development within new subdivisions, where site and building design can more easily meet the new regulations for Secondary Suite development.

As for Garage Suites, uptake so far in the Terwillegar Zones, where they have been allowed on a discretionary basis (TSDR and TSLR), has been low. It is not seen that there is a great potential for Garage Suite development, given estimates for the development of a Garage Suite in the neighbourhood of \$84,000, when compared to the costs for retrofitting an existing developed basement to a Secondary Suite of between \$10,000 and \$25,000.

4. Locational Restrictions: Implications of Phase 1 Restrictions on Developing Suites (see also: Background #1 Summary of Issues and Concerns, page 2, part 2: Phased Approach).

Looking forward to Phase 2 of the Zoning Bylaw amendments to increase the opportunity for Secondary Suites, there appears to be both general support and general demand for eventually removing, or reducing to a much greater degree, locational restrictions on Secondary Suites proposed in Phase 1 that apply to the RF1 and RF2 Zones (and the Permitted opportunity in RF3).

The random survey conducted in June 2007 showed that 55% disagree/strongly disagree that "Secondary Suites should only be allowed in select areas of neighbourhoods".

While most who responded to the questionnaire at the three Secondary and Garage Suite open houses (September 2007) supported a phased approach (13/16 respondents), 6 respondents had concerns with a phased approach, suggesting that it may be too restrained. Some suggested that if the key requirements in the Secondary Suite regulations are met, then there is no need for keeping locational criteria in the RF1 and RF2 zones. Two comments indicated that the phases need to be timed to the demand for housing.

Most inquiries to the Planning and Development Department regarding potential Secondary Suite and Garage Suite development received since January, 2007,

through both the Development Compliance Branch and the Zoning Bylaw Implementation Section, have been from owners of RF1 lots. Most, however, will not comply with the locational requirements in Phase 1. Staff have also received a number of inquiries from lot owners with non-conforming Secondary Suites. Again, most of these have been from RF1 lot owners, and most of these Suites will not be able to be legalized in Phase 1. The second most common zone of lot owners making Secondary Suite and Garage Suite inquiries is the RF3 Zone. Those RF3 lot owners interested in Secondary Suites will largely comply with the proposed Zoning Bylaw regulations (which allows Secondary Suites as a Discretionary Use, even under current Zoning Bylaw regulations, where they do not meet the Permitted Use locational criteria). As with the RF1 Garage Suite inquiries, most RF3 lot owners will not meet the locational criteria for Garage Suites (which, unlike the Secondary Suite opportunity in the RF3 Zone, does not apply throughout the whole zone).