



# City of Edmonton Office of the City Auditor

## Residential Infill Audit

June 4, 2019



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Objective

To determine the effectiveness of the City's infill efforts.

Scope

**In scope**

The City of Edmonton's strategies, legislation, policies and processes that are intended to support residential infill development in the City.

**Out of scope**

1. The rezoning and building permit review processes, including inspections.
2. Detailed operations of the specific teams created in relation to infill development (i.e., the Evolving Infill Team, the Infill Liaison Team and the Infill Compliance Team).
3. Work performed by the Subdivision and Development Appeal Board.

Statement of Professional Practice

This project was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.



# Executive Summary

## What did we do?

We reviewed the past ten years of residential infill development within the City of Edmonton, which covers the period since City Council decided to formally make this type of development a priority.

We reviewed the City's infill strategy to determine if it is aligned with past and current City Councils' expectations, and assessed high-level risks to residential infill development.

We also examined targets and evaluated processes related to development permit review, identifying past and planned initiatives to improve review timelines.

Lastly, we evaluated the overall residential infill development results over the last decade.

## What did we find?

While there is still some room for improvement, the City's infill strategy does primarily align with the expectations of current and past City Councils.

The City is actively addressing the significant risks to the progress of infill development, either directly through Infill Roadmap Actions or indirectly through other City initiatives.

We identified concerns with the quarterly reporting of development permit review performance measures for single detached housing, and found that more work needs to be done to improve the review timelines.

The proportion of residential infill development to City-wide development has trended upwards over the past ten years, and the City's infill target was met in 2018. This metric is the primary indicator of the overall effectiveness of the City's infill efforts.



# Recommendations

Recommendation 1  
Quarterly Reporting

Ensure that public reporting of performance measures related to infill development permit processing is reliable and comparable.

Recommendation 2  
Development Permit Review

Assess processes and requirements related to the review of infill-related development permit applications, and implement changes to improve review timelines.

Recommendation 3  
Zoning Bylaw Updates

Develop and implement a strategy to reduce the frequency of *Zoning Bylaw* updates.

Recommendation 4  
Use of the term "Infill"

Standardize the definition and use of the term "infill", specifically as to whether or not it includes established neighbourhoods, and ensure it is used and reported on consistently.





# Background







## What is Residential Infill?

Residential infill is the development of new housing in previously developed neighbourhoods. This may include secondary suites, garden suites, duplexes, semi-detached and detached houses, row houses, apartments, and other residential and mixed-use buildings.

Instead of taking place on the fringes of the City, it occurs in the middle of neighbourhoods that can be 25+ years old. If not well managed, the construction work can be disruptive and potentially lead to drainage, foundation or other issues with neighbouring properties. But if done well, it can lead to a rejuvenated neighbourhood with more housing options available.

## Housing Types

There are a variety of housing types, or forms, that can be built as part of residential infill:

<p><b><i>Garage or Garden Suites</i></b></p> <p>Stand-alone unit, in the backyard of another housing type</p> 	<p><b><i>Secondary Suites</i></b></p> <p>Self-contained unit, within another housing type</p> 
<p><b><i>Semidetached or Duplex Houses</i></b></p> <p>Two dwellings joined with a common wall (semidetached) or one above the other (duplex)</p> 	<p><b><i>Single Detached Houses</i></b></p> <p>Can include “traditional” single family homes, or “skinny” homes</p> 
<p><b><i>Row Houses</i></b></p> <p>Three or more dwellings joined at the side</p> 	<p><b><i>Apartments</i></b></p> <p>Many dwelling units within a building, sharing a common entrance</p> 

## Residential Infill Governance Documents

Residential Infill within the City of Edmonton is governed by:

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<i>Bylaw 12800 – The Zoning Bylaw</i>	Contains the rules and regulations for the development of land in Edmonton.
<i>Policy C551 - Residential Infill in Mature Neighbourhoods</i>	Sets planning and design standards intended to assist the City of Edmonton and the development industry in achieving high quality residential infill.
<i>The Way We Grow – Municipal Development Plan – Bylaw 15100</i>	Contains strategies to coordinate growth in the City.  This includes encouraging a minimum of 25% of City-wide housing unit growth to locate in the Downtown and mature neighbourhoods and around LRT stations and transit centres.
<i>The 2018 Infill Roadmap</i>	The City of Edmonton’s workplan to support more and better infill in the City.  It contains actions to answer the question of how the City can welcome more people and new homes in its older neighbourhoods.

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## Significant Changes to Residential Infill in the City

Infill development has been taking place in the City since long before there was a formal policy. In the late-2000’s City Council decided there was a need to actively encourage residential infill development, for a number of reasons ranging from rejuvenating neighbourhoods to densifying and making greater use of infrastructure and services.

Since the City began to prioritize residential infill, there have been a number of significant changes to both policy and strategy.

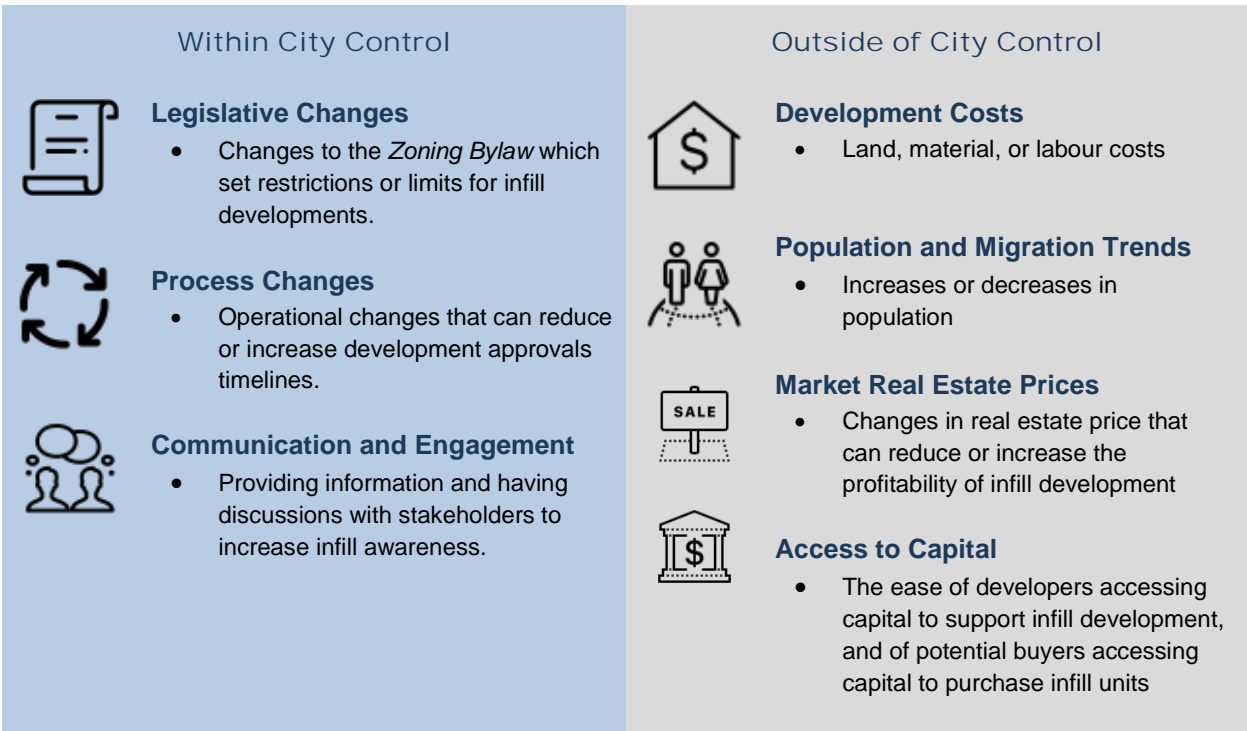
## Selection of Significant Changes Impacting Residential Infill

2009	<p>Creation of <i>C551 Residential Infill Policy</i> and <i>Residential Infill Guidelines</i></p> <ul style="list-style-type: none"> <li>Policy to set planning and design standards; guidelines detailing the applicable locations and the planning and design guidelines for residential infill.</li> </ul>
2010	<p>Approval of <i>The Way We Grow</i>, Edmonton's Municipal Development Plan</p> <ul style="list-style-type: none"> <li>Provides direction for growth and development, expecting the City to be home to more than 1 million people by 2040.</li> </ul>
2011	<p>Council approval of New Residential Units in Mature Areas (Infill) target</p> <ul style="list-style-type: none"> <li>Set a target in <i>The Way Ahead</i> to realize a minimum of 25% of all net new residential units being built in mature areas, by 2018.</li> </ul>
2013	<p>Initiation of <i>Evolving Infill Project</i></p> <ul style="list-style-type: none"> <li>Included a dedicated team to develop a strategy to "evolve" infill in Edmonton.</li> </ul>
2014	<p>Introduction of first <i>Infill Roadmap</i></p> <ul style="list-style-type: none"> <li>Two year plan to advance infill, with an initial focus on small scale development.</li> </ul>
2016	<p>Creation of <i>Infill Compliance Team</i> and <i>Infill Liaison Team</i></p> <ul style="list-style-type: none"> <li>The Infill Compliance Team was created to perform routine inspections and enforce compliance at infill sites in mature neighbourhoods.</li> <li>The Infill Liaison Team was to advance the City's infill conversations through outreach and education. They act as a point of contact for citizens, analyze infill related issues and complaints, and support ongoing policy development.</li> </ul>
2017	<p>Most recent review of the <i>Mature Neighbourhood Overlay</i></p> <ul style="list-style-type: none"> <li>The Overlay was established in 2001. This review was to implement changes to make the Overlay a more effective tool to support infill in the City's mature neighbourhoods.</li> </ul>
2018	<p>Introduction of second <i>Infill Roadmap</i></p> <ul style="list-style-type: none"> <li>A continuation and extension of the first <i>Infill Roadmap</i>, with a focus on moving towards medium and high scale development. Includes 25 "Actions" within the areas of Knowledge, Collaboration, Advocacy, Process and Rules.</li> </ul>
Near Future	<p>Missing Middle Zoning Review</p> <ul style="list-style-type: none"> <li>Project to conduct a review of Edmonton's middle density residential zones and associated overlay, to identify changes needed to reduce barriers in the development of "missing middle" housing.</li> </ul>
	<p><i>Zoning Bylaw Renewal</i></p> <ul style="list-style-type: none"> <li>The current <i>Zoning Bylaw</i> was established in 2001. This project aims to create a <i>Zoning Bylaw</i> that: aligns with strategic policies and objectives; provides regulations that support better built form outcomes; is user-friendly for all audiences, with clear and enforceable regulations; and, is adaptable over time.</li> </ul>
	<p>Development of <i>The City Plan</i>, replacing the current <i>Municipal Development Plan</i></p> <ul style="list-style-type: none"> <li>Will outline the plan for the City's future and decide what sort of city is desired for a potential population of 2 million people.</li> </ul>

These changes do not reflect the significant number of *Zoning Bylaw* updates over the past ten years.

## Factors Affecting Residential Infill

The City is able to encourage infill development through a number of means; however, there are a number of other factors that are outside of the City's control, which can also have a large impact on residential infill development.





## Process Steps for Residential Infill Development

When a property owner in an infill area decides to develop that property, there are a number of steps to go through.



### Rezoning and Subdivision

Infill development projects may or may not be required to go through the rezoning or subdivision processes, depending on the current zoning classification and intended housing type.

Rezoning may be required if there is an intended change to the type and scale of development. Subdivision is used to split a property into multiple parcels of land, and is generally required for building “skinny” houses.

### Development Permits

A development permit approves the use of a site, as well as the size and location of any buildings or structures. It is written approval from the City that the plans are in accordance to the *Zoning Bylaw* regulations. An approved permit is required before being able to move into the building permit process.

### Building Permits

Once an approved development permit is in place, the property owner can apply for a building permit which is reviewed to ensure compliance with safety codes and energy regulations. Inspections are performed to ensure that specific portions of the building process was performed in accordance with the permit.



## Alignment with Council Expectations

### Summary of Findings

The strategic direction of the City's efforts around residential infill generally aligns with the expectations of both current and past City Councils.

While some current Council members believe that the City still has work to do in order to fully meet their expectations, they also believe that the City can meet those expectations through current ongoing and planned initiatives.

### Why is it important?

City Council acts as the decision maker for the City, setting expectations by providing direction and approving policy changes. One of Council members' roles as elected officials is to act as the voice for their constituents and stakeholders. If City Administration's actions are not aligned with the expectations set by Council, this could be an indicator that the general wishes of the citizens and stakeholders are not being met.

### What are Council's Expectations?

Although residential infill development has been taking place in the City for decades, Council formalized it as a strategic priority in the late 2000's. (See timeline on page 6 of this report)

To determine the expectations of both past and present Council members, we:

- Reviewed Policy *C551 Residential Infill in Mature Neighbourhoods* and its supporting procedure *Residential Infill Guidelines* (approved in 2009). The policy includes a number of goals, objectives and principles intended to guide the future of infill development in the City.
- Reviewed video of Council meetings where significant infill-related topics were discussed, such as: various *Zoning Bylaw* updates, including splitting of 50 foot lots, giving rise to "skinny homes" in Edmonton, and changes to garage suite regulations; setting the Infill target for Percent of New Residential Units in Mature Areas; and, updates to the Residential Infill Guidelines.

- Sent surveys about residential infill to current City Council members, and received five responses.

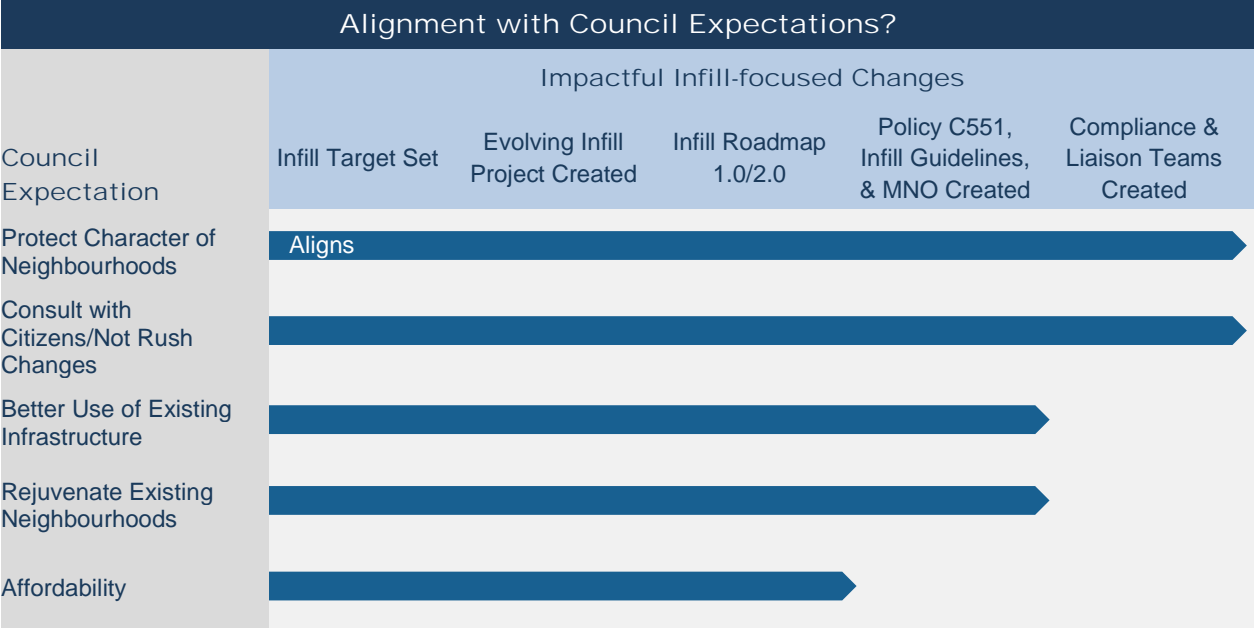
From these various sources, we identified the following primary Council expectations:

- Address the concerns of neighbours and **protect the character** of single family developments in mature neighbourhoods.
- Recognize that this will be a long-term process, with a need to **consult citizens and not rush changes**.
- Formally prioritize residential infill development to make **better use of existing infrastructure** and services.
- **Rejuvenate existing neighbourhoods** and provide more housing options.
- Include an **affordability** component.

### What are the Impactful Infill-Focused Changes Made by the City?

We then identified what we believed to be some of the most important and impactful infill-focused changes that have been made in the past ten years and determined if they align with Council's expectations. The impactful infill-focused changes include:

- Council approval of **Infill target**
- Creation of the **Evolving Infill Project**
- Development of the **Infill Roadmap 1.0 / 2.0**
- Development of **Policy C551, Residential Infill Guidelines, and the Mature Neighbourhood Overlay**
- Creation of the **Compliance and Liaison Teams**



As shown, these significant changes made to the infill strategy over the past ten years do align with Council expectations.



# Addressing Risks to Residential Infill

## Summary of Findings

The City is actively addressing the significant risks to the progress of infill development, either directly through Infill Roadmap Actions or indirectly through other City initiatives.

## Why is it important?

Residential infill development has become a priority in the City. If the City is not appropriately addressing risks that could negatively impact that development, there is higher likelihood that the City will not be able to meet its targets for residential infill development.

## Risk Identification and Assessment Process

Administration has actions in place to address the most significant risks to residential infill.

During the planning phase of this audit we conducted risk identification meetings with internal stakeholders (various members of City Planning Branch, Development Services Branch, and Corporate Strategy Branch), external stakeholders (members of Canadian Home Builders Association – Edmonton Region, Infill Development in Edmonton Association (IDEA), and one other local Developer focused on large-scale projects). We also viewed past Council meetings and reviewed related documents such as the Infill Roadmap and Council reports.

We then discussed the most significant risks with members of Administration to identify what the City is doing to address them. Administration indicated that they are addressing most of the risks through Actions identified in the Infill Roadmap, or other related initiatives.

For each significant risk we assessed if the Roadmap Action or other initiative is either underway or formally planned, with a stated timeline and funding in place (i.e., there is a low chance that the work would not be performed), and was intended to address the identified risk. We found that Administration has actions in place to address the most significant risks to residential infill development.



## Actions Addressing Significant Risks to Infill

Risk	Initiatives Underway or Planned
Development permit requirements lead to large processing time variances. (Evaluated in greater detail in the next section of the report.)	<ul style="list-style-type: none"> <li>• <b>Roadmap Action 14</b> - improve consistency and timelines for infill development permit process.</li> <li>• Development Services Branch is working with IDEA on an accelerated permit program.</li> <li>• The <i>Zoning Bylaw Renewal Project</i> is intended to make the bylaw more user-friendly.</li> </ul>
Infill has more regulations compared to greenfield, which could be seen as barriers to infill development.	<ul style="list-style-type: none"> <li>• <b>Roadmap Actions 18-25</b> - the Actions in the Roadmap Rules section are designed to address this risk.</li> <li>• The <i>Mature Neighbourhood Overlay</i> is designed to protect existing neighbourhoods, even if it imposes additional regulations.</li> </ul>
Infill development is more expensive than greenfield development.	<ul style="list-style-type: none"> <li>• <b>Roadmap Action 6</b> - develop tools to improve housing affordability in all neighbourhoods. Will include considering incentives to achieve the intent.</li> <li>• <b>Roadmap Action 10</b> – incentivize the development of fully accessible and seniors friendly laneway homes. Will consider the potential to offer grants for garden or secondary suites.</li> <li>• Affordability is not just about low income, but also about overall affordability.</li> <li>• Land closer to core is naturally more expensive. Other Actions aimed at removing barriers to higher density development are expected to assist in reducing the per-unit cost.</li> </ul>
Citizens have concerns with infill development.	<ul style="list-style-type: none"> <li>• <b>Roadmap Action 9</b> - better inform residents on how they can effectively participate in the planning process.</li> <li>• The Infill Liaison Team was launched in August 2016, as an ongoing resource, and includes roles of performing outreach and education, and serving as a point of contact for infill questions.</li> <li>• The Infill Compliance Team was created in April 2016, and is responsible for responding to infill-related complaints.</li> </ul>
Current infrastructure can't meet requirements for higher density infill, leading to costly upgrades.	<ul style="list-style-type: none"> <li>• <b>Roadmap Action 2</b> - review infrastructure capacity in Edmonton's older neighbourhoods and identify the infrastructure investments needed to support infill. This is intended to be able to provide interested parties with information in advance of a development application.</li> <li>• <b>Roadmap Action 16</b> - develop an equitable, transparent and predictable system to share the costs of infrastructure upgrades and renewal costs for infill projects.</li> </ul>
Medium density development is difficult to achieve due to the need to acquire adjacent lots.	<ul style="list-style-type: none"> <li>• <b>Roadmap Action 7</b> - investigate available tools to address the challenges of infill land assembly and financing mixed use developments.</li> <li>• Based on discussion with Administration, this will most likely be more of a research and education project.</li> <li>• One potential option is to sell City-owned surplus land, however this is a limited resource and selling it for development must be done cautiously.</li> </ul>



# Development Permit Review Timelines

## Summary of Findings

The City has a number of initiatives underway that are intended to improve infill-related development permit review timelines and consistency. They need to ensure these changes are made to meet their targets.

## Why is it important?

As mentioned in the previous section, internal and external stakeholders both mentioned the development permit review process as one of the areas of greatest concern. Inconsistent and long review timelines in the application process can lead to frustrations for permit applicants, as well as added carrying costs.

External stakeholders noted that while the City has made improvements in recent years, they believe more needs to be done to make the application process quicker, and ensure consistent timelines.

Our work related to the development permit application process for single detached residential houses, as Development Services publicly reports review timelines for this housing type.

## Development Permit Application Review Process

*Assignment* – A development permit is assigned to a development Officer for review once the developer makes a development permit application and pays the related fees.

*Circulation* - The Development Officer will do an initial check for completeness and accuracy of the application, and determine if it needs to be circulated for review by other City groups such as Transportation or Addressing.

*Technical Review* - The Development Officer performs a detailed assessment of the application.

- *No variances* - If all parts of the application comply with the *Zoning Bylaw*, it is deemed to be Class A (no variances) and the Development Officer can approve the permit.
- *Variances* - If the Development Officer identifies parts of the application that do not comply with the requirements of the *Mature Neighbourhood Overlay* or other parts of the *Zoning Bylaw*, the applicant will be

given an opportunity to make changes or elect to proceed with a request for variances.

*Consultation* - Any applications that require a variance to the *Mature Neighbourhood Overlay* requirements trigger a consultation requirement where neighbouring property owners are notified of the application, and have 21 days to voice any concerns.

*Permit Decision* - After the consultation period has passed, the Development Officer makes a decision to approve the application with variances, or refuse it.

*Notification* - Approved Class B permits (those with variances to either the underlying zone requirements or the *Mature Neighbourhood Overlay*) then move into another 28 day notification period, including 7 days to allow for mail delivery, during which neighbours can appeal the permit approval. If the notification period passes without an appeal, the development permit is issued.

*Appeal* – Applicants can appeal refused Class B applications to the Subdivision and Development Appeal Board for resolution. The same goes for neighbours who wish to appeal an approved Class B permit.

## Common Areas of Delay in the Permit Review Process

*Unpaid fees* – Developers sometimes do not pay their application fees when they make their development permit application. The City will not begin reviewing the application until fees are received.

*Workloads* - Time required in the *Assignment, Circulation* or *Technical Review* segments of the process can vary with City staff workload, which can be impacted by staffing levels and by the number of applications being received. There can also be delays when an applicant is making changes to reduce any requests to variances.

*Requested variances* - Class B applications and approved Class B permits with requested variances to the *Mature Neighbourhood Overlay* can take an additional seven weeks to process due to the *Consultation* and *Notification* periods. These periods are mandated in the *Zoning Bylaw*.

## Performance Measurements

Development Services has set development permit review targets of 20 to 30 days for single detached infill houses (depending on the season).

As part of our review of development permit processing timelines, we looked at the current performance measure results that are reported by the Development Services Branch on a quarterly basis. The length of time to review a development permit application is one of the areas within the City's control, which can have an impact on infill development.

In 2018, the Branch began setting specific targets and publicly reporting on the length of time between when a single detached house development permit application is received (including fees paid) and when the Development Officer completes the *Technical Review*. The Branch did this to be transparent with stakeholders and give staff set timelines to work towards.

However, we identified concerns with the reliability and comparability of the measure. This includes:

- Results are not reliable - The way the Branch is currently calculating the measure does not take into account all the applications it has received in the period. Therefore the results it reports on are not complete or accurate.
- Prior period data is not comparable – The Branch frequently has to restate prior period results based on when it decided to include applications in the calculation of the measure. Therefore they are usually not comparable when they are first reported.

As we cannot rely on the measure results we are not including whether or not the Branch has met its review timeline targets for single detached infill houses.

### Recommendation 1 Quarterly Reporting

#### Recommendation

Ensure that public reporting of performance measures related to infill development permit processing is reliable and comparable.



#### Responsible party:

Branch Manager, Development Services



Accepted by Management

### Management Response

Administration will clarify within the Quarterly Activity Report how the data is collected and reported to enhance the reliability and comparability of the data for the public. A further review of how infill related data is collected for the quarterly report will be undertaken to ensure that the correct data sets are being published in a way that is accurate and transparent. Administration will review the internal targets in order to ensure they are realistic, including assessing shared responsibility and accountability between industry and Administration in meeting established targets.



### Implementation:

September 30, 2019

## Past Initiatives to Improve the Development Permit Review Timelines

The City can impact development permit review timelines through legislative or process changes, or through communication and engagement.

Some of the past initiatives the City has made, which should have an impact on permit review timelines include:



### Legislative Changes

The City uses *Zoning Bylaw* updates to clarify or relax requirements. Relaxing requirements leads to more applications being considered Class A (no variances to the *Zoning Bylaw*) and not having to go through the community *Consultation* or *Notification* periods that Class B (variances to the *Zoning Bylaw*) applications do.

The City performed a Mature Neighbourhood Overlay Review in 2017, which altered a number of the regulations within the *Zoning Bylaw*. According to one City report, this reduced the proportion of Class B single detached house permits (in 2017) from 33% to 8%.





**Process Changes**

There are more regulations in place for infill development compared to greenfield areas, and correspondingly more complex review requirements. The City has split the application review process into two corresponding streams, with more experienced Development Officers assigned to reviewing infill-related applications.



**Communication and Engagement**

The City introduced pre-application consultation meetings for small-scale infill development proposals, providing applicants an opportunity to meet with a Development Officer and discuss areas of potential concern prior to actually submitting an application.

Upcoming Initiatives

There are also a number of planned initiatives that are expected to have a positive impact on permit review timelines:



**Legislative Changes**

The City is working on the Missing Middle (medium density residential zones and associated overlay) Zoning Review to identify changes to further encourage medium scale development.



**Process Changes**

Development Services is currently working on an accelerated infill development permit application process for Class A (no variances to *Zoning Bylaw*) single detached and semi-detached applications, which should decrease permit processing time substantially for those applicants who are able to use this new process.

As well, the Urban Form Business Transformation Initiative includes work to improve how the City processes development permits.

It was noted by both internal and external stakeholders that more work needed to be done to improve the infill-related development permit review timelines.

Recommendation 2  
Development Permit Review

**Recommendation**

Assess processes and requirements related to the review of infill-related development permit applications, and implement changes to improve review timelines.



**Responsible party:**

Branch Manager, Development Services



**Accepted by Management**

**Management Response**

Administration will continue to review and refine set internal targets for infill related development review timelines, supporting the advancement of Action 14 of Infill Roadmap 2018. Other actions include evaluating the assignment of work within development approval teams to ensure resources are available to review infill-related development permit applications. As part of its 2019 work program, Administration is exploring a two-year pilot project with industry which aims to provide an incentive to certain development permit applicants who demonstrate knowledge of infill regulations and best construction practices. The incentive would look to implement process changes to provide more certainty to infill-related development review timelines.



**Implementation:**

March 31, 2020

*Zoning Bylaw Updates*

During our review of *Zoning Bylaw* updates and through discussions with both internal and external stakeholders, we identified that during the past few years the frequency of updates have been significant.

Bylaw changes can be proposed by members of the public, Administration or by City Council. The City generally makes changes to the bylaw to clarify or relax requirements. However, each change can have an adverse impact on the time requirements of applicants who are preparing to apply for

a development permit or are having their permit reviewed when the change is effective. This is because they may need to make adjustments to their applications to reflect the updated bylaw. Changes also have an impact on the Development Officers who are reviewing the applications, as they are required to assess applications in accordance with the *Zoning Bylaw* in effect at that time. When multiple changes are made within a short timeframe, the impact can have a compounding effect.

There were 199 text amendments to the *Zoning Bylaw* between 2009 and 2018, some of which would have directly related to residential infill development. There were 65 amendments made in 2017/2018 alone, and approximately 17 of those amendments could have impacted residential infill.

One idea that was raised by Administration was in cases where the changes are not time-sensitive in nature, potentially “saving” the proposed amendments and implementing them once or twice per year. Reducing the frequency of *Zoning Bylaw* changes will help reduce the negative impacts to permit applicants and Development Officers.

Recommendation 3  
*Zoning Bylaw* Updates

**Recommendation**

Develop and implement a strategy to reduce the frequency of *Zoning Bylaw* updates.



**Responsible party:**

Branch Manager, Development Services



**Accepted** by Management

**Management Response**

Starting in 2019 and running through 2022, Administration plans to address the impacts of incremental and reactive *Zoning Bylaw* changes through focus on the more comprehensive *Zoning Bylaw* Renewal project. This project will review all the rules that regulate development in Edmonton and is intended to rethink how regulations can be more

efficient, effective, and adaptable over time to reduce the frequency of subsequent amendments.

To be able to focus on this comprehensive work, Administration has already started to reduce the number of self-initiated Zoning Bylaw amendments. Amendments may still be requested through motion of Council and the annual omnibus. Where infill-related amendments are brought forward, Administration will seek to combine multiple issues together to reduce the frequency of Zoning Bylaw amendments.



**Implementation:**

December 31, 2020



# Infill Results

## Summary of Findings

The City met its target of 25% of net new residential units being developed within mature neighbourhoods and downtown in 2018.

Part of meeting this target likely related to legislation and process changes, and communication and engagement efforts over the past ten years; however, the factors outside of City control that impact the level of infill development would also have had an impact on those results.

## Factors in City Control that can Impact Residential Infill

Legislative changes, process changes, and communication and engagement can have a direct impact on the overall level of residential infill development.



### Legislative Changes

- **Allowing lot splitting (2013) and reducing lot size requirements (2015)** – saw the number of lot splits for single detached housing grow from 22 in 2013, to 104 in 2015, to 214 in 2018.
- **Reduced location restrictions on garage suites (2015)** – led to a 96% increase in the number of building permits issued in the following year.
- **Expanding opportunities for Secondary Suites (2018)** – created the conditions for additional units by allowing secondary suites in more instances.
- **Allowing semi-detached and duplex housing in RF1 and RF2 zones (2018)** – this change is expected to lead to a considerable increase in the number of building permits for this category.



### Process Changes

- Established the **Infill Compliance Team** in 2016, to perform proactive inspections and respond to infill complaints. The Infill Compliance Team performed 1,654 inspections in 2017, and 2,320 inspections in 2018.





### Communication and Engagement

- Creation of a dedicated **Residential Infill Website and the Infill Liaison Team** in 2016 have provided additional sources of information for citizens concerned with infill development, as well as for those interested in going through the process of development. An average of 15,800 unique users per year have viewed the website.
- **Consultation** is performed with stakeholders in advance of significant changes, such as in the development of the Infill Roadmap or the Zoning Bylaw Renewal.

### Factors outside of City Control that can Impact Residential Infill

While there are things that the City is able to do in order to encourage residential infill development, there are also a number of factors outside of the City's control, that can affect residential infill.

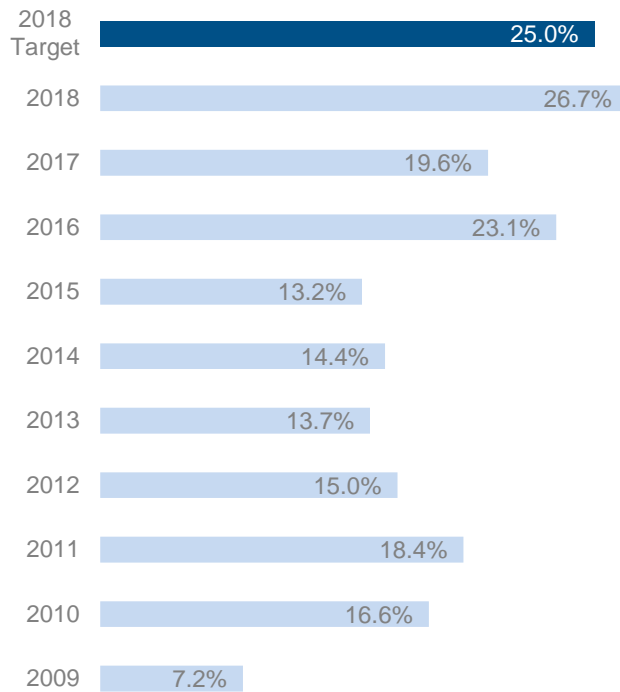
Development costs, population and migration trends, the overall real estate market and access to capital (for both developers and potential purchasers) can significantly alter the level of residential development.

Each of these factors can work for or against the level and housing mix of residential infill development.

## 2009 to 2018 Infill Results – Mature and Downtown Neighbourhoods

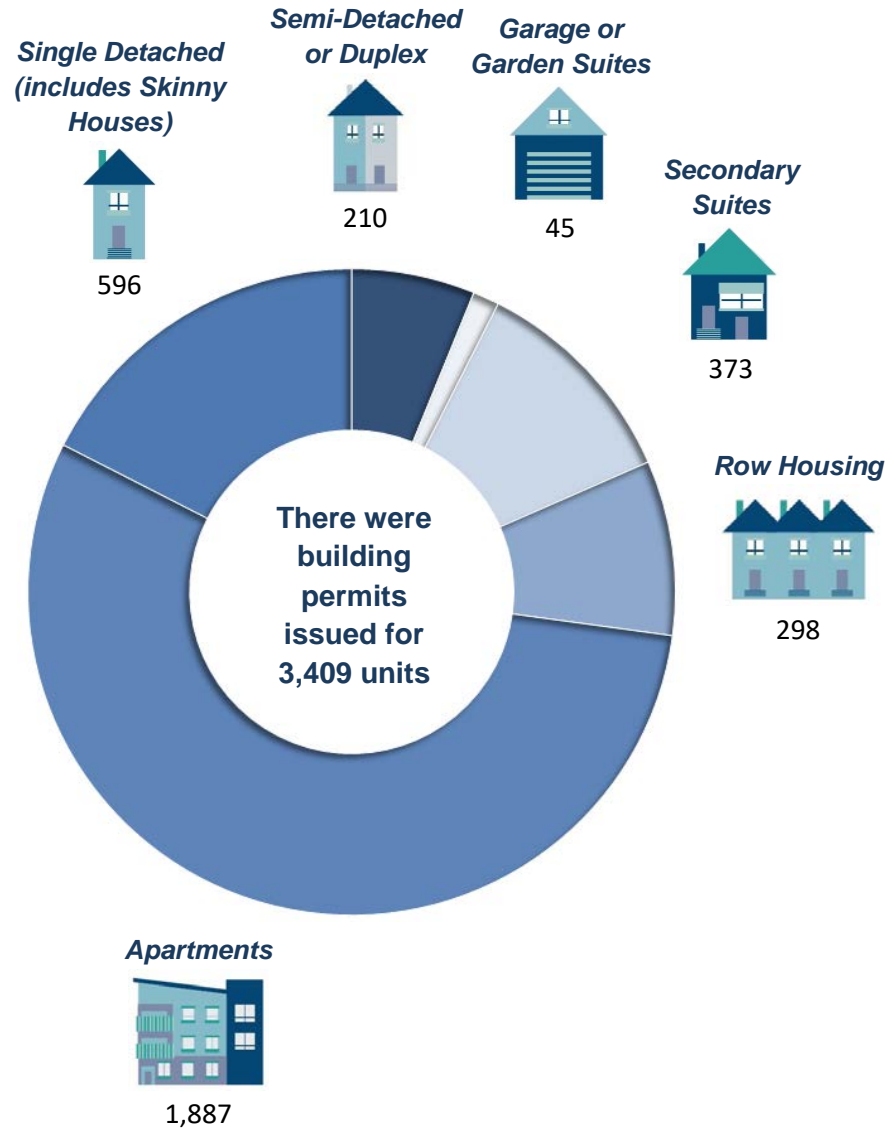
The City had a target to realize **25%** of City-wide net new housing units **in mature and downtown neighbourhoods** in 2018. Approximately 15,000 net new units were built in this timeframe.

While individual years' results have varied over the past decade, the overall trend has been upward and the target was met in 2018.



## 2018 Housing Mix

The mix of infill development can fluctuate from year to year depending on a number of factors. In 2018, the City issued infill-related building permits for the following number of units:



Definition of Infill – Include Established Neighbourhoods?

When infill development started to become more of a priority for the City in the late-2000's, there was an understanding of the need to preserve the character of mature and downtown neighbourhoods. Mature neighbourhoods are those built in 1970 or earlier.

Correspondingly, there was an emphasis on mature and downtown neighborhoods in both the focus on the *Mature Neighbourhood Overlay* and in target-setting for residential infill. The City's *Residential Infill Guidelines* also relate explicitly to development within the *Mature Neighbourhood Overlay*.

Over time, however, discussion around infill development began to frequently include work performed in established neighbourhoods. Established neighbourhoods are those built between 1971 and 1995.

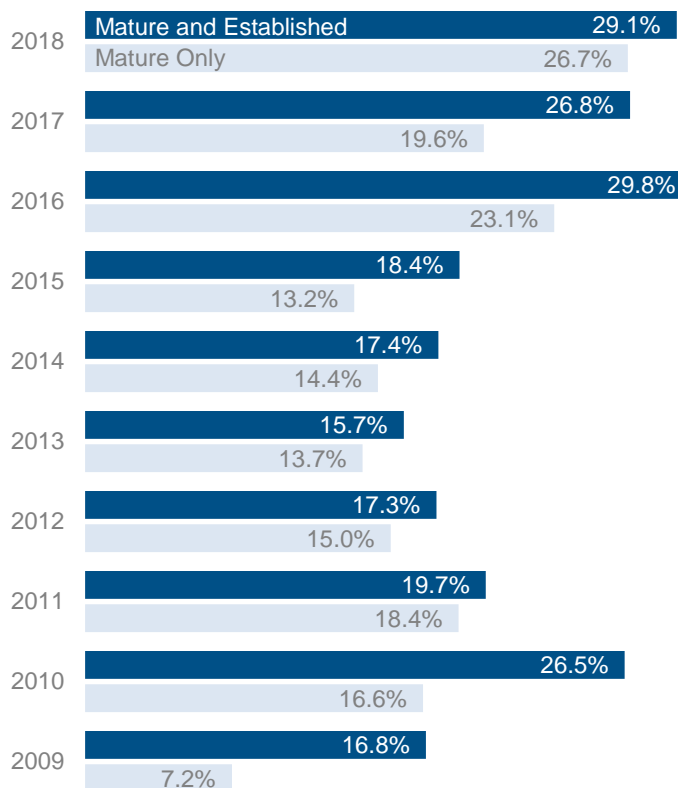
The Infill Roadmap, reporting by the City's Growth Analysis group, and Development Services' tracking of timelines for single detached house development permit applications, each use a definition of infill that includes established neighbourhoods.

The inclusion of established neighbourhoods, within the context of residential infill development, fits with the Council expectations of making better use of existing infrastructure and services, and increasing density.

## 2009 to 2018 Infill Results – Mature, Downtown and Established Neighbourhoods

Given the evolving view of whether or not residential infill includes established neighbourhoods, we re-performed the % of net new units calculation, including established neighbourhoods. Doing this increases the total number of net new housing units created by residential infill from 15,000 to 19,000

Including established neighbourhoods in the calculation of City-wide net new units adds a further 1.3% to 9.6% per year to the results.



The concept of "what infill is" has evolved over time, but even the current usage isn't always applied consistently. The recently released *Corporate Business Plan 2019-2022*, makes reference to Evolving Infill 2.0 as focusing on "neighbourhoods that were generally completed before 1970", or mature neighbourhoods.

The City has not made changes to standardize usage of the term "infill" throughout the City, and this inconsistency could potentially lead to confusion.

## Recommendation 4

Use of the term "infill"

### Recommendation

Standardize the definition and use of the term "infill", specifically as to whether or not it includes established neighbourhoods, and ensure it is used and reported on consistently.



#### Responsible party:

Chief Planner, City Planning



**Accepted** by Management

### Management Response

The definition of infill was initially established and formalized through The Way We Grow, and was connected to the neighbourhood classification system. As policies, programs and service provision has been developed, the term infill has been applied in different contexts. The City Plan, currently being developed and set for adoption in 2020, will revisit infill policy and establish a new understanding of what infill is. This new understanding may impact how the City delivers existing infill related services, or how those services are communicated or branded, and will occur after The City Plan is adopted.



#### Implementation:

December 31, 2020



## Conclusions

### What did we find?

In this audit we assessed the effectiveness of the City's infill efforts. We conclude that the City efforts, combined with factors outside of City control, have led to meeting the 2018 infill target of having at least 25% of net new housing units in mature and downtown neighbourhoods.

The strategic direction of the City's efforts aligns with the expectations of current and past City Councils and the City is actively addressing the significant risks to infill development. However, there are opportunities to improve the overall process.

The Development Services Branch has a target for reviewing infill-related single detached permit applications within specific timelines. We identified concerns related to the reliability and comparability of this measure.

We recommended additional assessment and changes related to development permit review processes and requirements to improve review timelines, and implementation of a strategy to reduce the frequency of *Zoning Bylaw* updates as a way to reduce negative impacts associated with numerous updates.

The way the City thinks about infill has changed over the past decade, evolving to include established neighbourhoods within the concept. We found that although this shift is occurring, various City groups still talk about residential infill inconsistently.

We would like to extend our thanks to the external stakeholders who met with us to provide valuable input and context, and the numerous employees in the Urban Form and Corporate Strategic Development Department who shared their knowledge with us throughout this audit.