

## GROUND LEVEL ENTRANCES FOR CLUSTER HOUSING OR MULTI-UNIT HOUSING

### Recommendation

That Administration prepare amendments to Zoning Bylaw 20001, as outlined in Attachment 1 of the May 22, 2024, Urban Planning and Economy report UPE02155, and return to a future City Council Public Hearing.

<b>Requested Action</b>	Committee Decision Required		
<b>ConnectEdmonton's Guiding Principle</b>	<b>ConnectEdmonton Strategic Goals</b>		
<b>CONNECTED</b> This unifies our work to achieve our strategic goals.	<b>Urban Places</b>		
<b>City Plan Values</b>	LIVE		
<b>City Plan Big City Move(s)</b>	A Rebuildable City	<b>Relationship to Council's Strategic Priorities</b>	15-minute Districts
<b>Corporate Business Plan</b>	Transforming for the Future		
<b>Council Policy, Program or Project Relationships</b>	<ul style="list-style-type: none"> <li>Zoning Bylaw 20001</li> </ul>		
<b>Related Council Discussions</b>	<ul style="list-style-type: none"> <li>October 16, 2023 to October 23, 2023, Urban Planning and Economy report UPE02036, Charter Bylaw 20001 To adopt a new Zoning Bylaw for the City of Edmonton and repeal Bylaw 12800 (the current Edmonton Zoning Bylaw)</li> </ul>		

### Previous Council/Committee Action

At the October 16-20/23, 2023, City Council Public Hearing, the following motion was made:

That Administration prepare amendments to the Zoning Bylaw (Charter Bylaw 20001) that address the requirement that all Ground Floor Dwellings in Multi-unit Housing buildings greater than 10 metres in length that face a street, shared-use path, or park, provide an individual Ground Floor entrance in applicable residential or mixed use zones.

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### Executive Summary

- Ground floor entrances for dwellings in larger residential buildings provide residents with direct access to the street. This type of architectural feature can also reduce the presence of blank walls and create a better street presence for the building.
- Zoning Bylaw 20001 requires these entrances when the multi-unit residential building is longer than 30 metres in width and faces the street in the (RS) Small Scale Residential Zone, (RSF) Small Scale Residential Flex Zone, (RSM) Small-Medium Scale Transition Residential Zone, and the (RM) Medium Scale Residential Zone.
- A jurisdictional scan of 10 Canadian municipalities indicated no consistent method to regulate entrances for this type of residential development.
- For smaller residential buildings, ground floor entrances are not required to provide visual interest. Other architectural features can be used to reduce the presence of blank walls.
- Requiring ground floor entrances for dwellings facing public spaces may create challenges related to access restrictions, safety concerns and applying the regulations consistently in different site contexts.
- Administration will draft amendments to the Zoning Bylaw for ground floor entrances to dwellings be required when buildings are greater than 12.8 metres in length to ensure larger residential buildings provide a street presence (Attachment 1), and return to a future Public Hearing.

### REPORT

Ground floor entrances to residential buildings can support a more attractive neighbourhood for residents as redevelopment occurs in accordance with The City Plan. For dwellings in larger residential buildings, ground floor entrances provide residents with direct access to the street. These entrances can also be used to visually break up large building walls, avoid blank walls and provide greater visual interest along a street by replicating the rhythm and streetscape of a typical residential neighbourhood. Previously, Zoning Bylaw 12800 required direct ground floor entrances for dwellings in residential buildings in the following circumstances:

- Where dwellings were located on the ground floor;
- With building walls that were longer than 12.2 metres facing the street; and
- Where located in the (RF3) Small Scale Infill Development Zone, (RF5) Row Housing Zone, (RA7) Low Rise Apartment Zone, or (RA8) Medium Rise Apartment Zones.

This requirement applied to smaller apartment buildings as well as larger apartment buildings (Images 1 and 2 in Attachment 2).

The Zoning Bylaw Renewal Initiative reconsidered how development is regulated in the city with a goal of developing a new Zoning Bylaw that was strategic, simplified and effective. The bylaw is intended to enable development more easily and ensure sufficient housing, services, and amenities for a future population of 2 million residents, as envisioned in The City Plan.

Zoning Bylaw 20001 revised zoning regulations for individual entrances to ground floor dwellings in multi-unit housing (e.g., apartments) to allow for more flexibility in how apartments and dwellings are designed at different scales and in different contexts. In small scale residential

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zones such as the (RS) Small Scale Residential Zone, where building wall lengths are limited to 30 metres, apartments require only the main entrance to the whole building to face the street, or an internal courtyard to face the street. On these sites, applicants may choose to provide individual entrances for ground floor dwellings as part of the design, but it is not a requirement.

In larger scale zones, such as the (RSM) Small-Medium Scale Transition Residential Zone and the (RM) Medium Scale Residential Zone, the requirement for apartments described above generally applies when the residential building's wall length exceeds 30 metres and faces the street. This aligns with the (RS) Small Scale Residential Zone and (RSF) Small Scale Residential Flex Zone.

### Analysis

#### Jurisdictional Scan

Administration reviewed the zoning bylaws of 10 Canadian municipalities to consider how other cities regulate ground floor entrances for dwellings in multi-unit housing (Attachment 3). Where zoning bylaws included requirements for ground floor entrances, there were no consistent methods of regulation:

- Calgary and Ottawa have some regulation in their Zoning Bylaws related to entrances to ground floor dwellings.
- Vancouver and Toronto rely on design guidelines outside of their zoning bylaws to provide guidance on when to provide ground floor entrances for dwellings facing the street.
- The other municipalities reviewed did not include regulations in their zoning bylaw.

#### Entrances for Smaller Buildings

Zoning Bylaw 20001 does not require individual entrances for buildings less than 30 metres in length (i.e. buildings developed on a minimum of two 15.2 metre or 50-foot wide lots). The rationale for regulating in this manner is to support flexibility for multi-unit housing in a range of contexts and building designs. The Zoning Bylaw requires developments to incorporate design features such as windows, balconies, semi-private courtyards, and building articulation to provide visual interest and minimize blank walls, and provides the applicant with flexibility to choose the design features that best address this regulatory requirement while meeting the applicant's design preferences.

Apartments that were constructed prior to these types of zoning regulations being established provide examples of this in effect (Images 3 and 4 in Attachment 2). These buildings use other architectural features such as windows and balconies to provide street presence and create a more interesting face to the building.

#### Entrances Facing Parks and Pathways

Administration analyzed the value of individual entrances for ground floor dwellings facing parks and shared-use paths. In some contexts, they contribute to the vibrancy, appearance and possibly safety of the park or shared-use path. However, there are several challenges with making this a standard requirement.

Administration has policies and standards, such as the Urban Parks Management Plan and the City Design and Construction Standards, that require physical separation (typically a fence)

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between the private development and public parkland (Images 5 and 6 in Attachment 2). In addition to defining where the public park space ends and the private property begins, this also establishes maintenance responsibilities, reduces incidences of improper activities (e.g., dumping garbage) and reduces potential conflicts between users of the public and private spaces.

Often park and shared-use path development occurs at different times from surrounding sites, Designs to provide park or pathway access connections may not align and can be expensive to reconfigure to adjacent sites.

In some instances for apartments or reverse housing (housing that fronts onto an open space), it may be necessary to provide access to adjacent parkland from private residential development. In these situations, Administration and the applicant work to create a suitable pathway between the public open space and private property to connect the ground floor access. Where ground floor units face natural areas or sensitive ecological areas, access would not be preferred to minimize potential trespass or encroachment into these ecological spaces.

### Perceptions of Privacy and Safety

During the development review process, the City often encourages building designers to provide windows and doors at ground level, increasing opportunities for “eyes on the street,” and allowing for more interaction between people on sidewalks and the residents in buildings. This can increase opportunities for safety where people are aware of other people’s presence in the area. This principle can also be applied where dwellings are facing parks or pathways. However, public engagement feedback indicated that entrances to dwellings from parks or pathways could also potentially increase real or perceived risks to safety, as it increases the number of uncontrolled points of access onto the site (Images 7 and 8 in Attachment 2). Requiring fencing along the property edge can provide privacy to residents. It would also decrease the likelihood of trespassing onto private property from the public open space. Avoiding stretches of blank walls on a building and creating visibility to a park, pathway, or a street can be achieved through windows and balconies, and not just entrances.

### **Next Steps**

Based on the jurisdictional scan, stakeholder feedback, a consideration of select existing developed sites, and the intent of the motion, Administration will bring forward the proposed amendments to Zoning Bylaw 20001 as outlined in Attachment 1.

These amendments propose the requirement for individual entrances for ground floor dwellings in multi-unit housing developments that face the street where the building wall greater than 12.8 metres in length in the (RS) Small Scale Residential Zone, (RSF) Small Scale Flex Residential Zone, (RSM) Small-Medium Scale Transition Residential Zone, and the (RM) Medium Scale Residential Zone. This would generally exempt apartment buildings constructed on one small scale residential lot (up to approximately 15 metres wide) from this requirement, as the main entrance for the whole building facing the street would still be characteristic of small scale residential housing and continue to allow the intended flexibility to create different housing types.

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By applying this requirement to larger residential buildings, the use of ground floor entrances with other architectural features can reduce the perceived size of the building while creating more opportunities for residents to have direct access to the sidewalk and street.

Administration does not recommend requiring individual entrances for ground floor dwellings facing a park or shared use path. Administration proposes that providing access to abutting public open space will remain an option where it is appropriate, such as for reverse housing, and not be made a requirement to all residential development in these contexts. Making this a requirement would conflict with current City policies and standards around private access to public spaces in many development contexts. It may result in increased costs for developments to create buildings with multiple frontages and safe access between the public and private sites. Creating additional points of access to the residential building may create additional risk areas and not provide the intended perceptions of safety. Where there is no benefit to provide this connection, variances would likely be required for developments, resulting in delays and uncertainty for these projects.

If Urban Planning Committee accepts the recommendation from this report, Administration will prepare a charter bylaw amendment as generally outlined in Attachment 1 and return to a future Public Hearing.

### **Community Insight**

At the October 16-20/23, 2023 Public Hearing, Administration indicated that there would be limited engagement opportunities for this issue based on the short time period available between when the motion was approved and when this report would be presented to Urban Planning Committee.

Industry stakeholders, and resident stakeholders, including the Edmonton Federation of Community Leagues and other community leagues, were provided a draft report and related attachments for comment for a period of two weeks. Their feedback was incorporated into the analysis and used to refine the proposed regulations found in Attachment 1.

### **GBA+**

The current regulation in Zoning Bylaw 20001 and the substance of the motion does not specifically include wording about accessibility requirements for ground floor entrances. Zoning regulations to ensure barrier-free access to ground floor dwellings are not required because the Alberta Building Code currently provides standards for access. The Alberta Building Code requires access to dwellings within apartments (e.g. multi-unit housing) to be barrier-free. Ground level entrances for dwellings on the first floor for apartments are not required to be barrier-free if there is another entry (typically, through a common internal hallway) to the dwelling that is barrier-free. If no other access is provided for these ground floor dwellings, then the entrance to these dwellings would need to be barrier-free in accordance with the Building Code.

### **Attachments**

1. Markup and Rationale of Proposed Text Amendment
2. Existing Residential Development Images

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### 3. Jurisdictional Scan