

What We Heard

Congregate Sleeping Areas in Emergency Shelters

ADVISE

City of Edmonton
Urban Planning and Economy,
Development Services
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SHAPE OUR CITY

Edmonton

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Project Overview

In September 2024, a motion from Council directed the City to limit the size of congregate sleeping areas in Edmonton's emergency shelters through the Zoning Bylaw. Council has been concerned about the impacts of shelters with large congregate sleeping areas on both shelter users and surrounding neighbourhoods, and directed the City to consider different approaches to regulating their size in order to help limit negative impacts.

As part of its investigation, the City engaged with shelter operators and the Government of Alberta (GoA) from the end of November to mid-December 2024 to understand the impacts of potential regulations on congregate sleeping areas. This What We Heard report documents the approach and results of engagement, as well as how feedback gathered through engagement was used to advise the recommendations made to Council. The City's response to this motion and recommendations on regulations regarding congregate sleeping areas are explained in Council Report UPE02714.

Engagement Approach

Given the narrow scope of this project, the City took a targeted approach to engagement that involved leveraging findings from previous engagement and conducting new engagement with select affected groups. Recognizing that they had previously engaged shelter users and operators in discussions about similar topics through other projects, the City began by reviewing findings from these past engagements. In doing so, the City wanted to identify what conversations had taken place and what was already known to avoid contributing to engagement fatigue. This was especially important in the context of engaging with shelter users and operators, given the sensitivity of the issues being discussed and that these groups have many other demands on their limited time and resources. By reviewing past engagements, the City identified previous feedback from shelter users and operators that was important to consider in the context of this project. Details of this feedback are discussed in the [Review of Findings From Previously Conducted Engagement](#) section of this report. The following describes the approach to new engagement that was conducted with select affected groups.

Who We Engaged

After reviewing findings from previous engagement, the City decided to limit new engagement for this project to shelter operators and the GoA. These groups were selected based on the direct and indirect impacts to their work if the City introduced regulations to congregate sleeping areas. The following table details the reasons for engaging with these groups and the response received.

Who	Why	Response
Shelter operators	Groups with expertise in making decisions about congregate sleeping areas and will be directly impacted by any regulations.	Eight shelter operators currently provide services in Edmonton. The City reached out to all of them; seven responded and provided feedback. ¹ Five of these seven operators use congregate sleeping areas in at least some aspect of their shelter(s).
GoA - Department of Seniors, Community and Social Services	Responsible for overseeing and funding shelters.	The City reached out to and received feedback from the Assistant Deputy Minister of Preventative Community Services.

The City carefully considered whether to engage with shelter users for this project and ultimately decided not to due to the narrow scope of the project, the limited timeframe for engagement and the vulnerability of shelter users. To mitigate against not hearing from shelter users directly, the City considered findings from previous engagement with shelter users, which included feedback about issues of crowding and lack of personal space in shelters (see the [Review of Findings From Previously Conducted Engagement](#) section of this report). The City also decided against engaging the public (residents and organizations like Community Leagues and Business Improvement Areas) on this project because the size of congregate sleeping areas is largely determined by factors such as the available building, building layout and operational plan of the shelter operator. Given the technical nature of this issue and that the public has no direct experience in how shelter spaces are allocated within a building, it was decided not to seek their input for this project.

How We Engaged

The City emailed representatives from each of the identified groups and provided the option of either meeting one-on-one sometime between November 28 and December 12, 2024, or providing written feedback to a set of questions by December 12, 2024. This engagement falls within the **ADVISE** level of the City's [Public Engagement Spectrum](#), meaning participants were asked to share feedback and perspectives on what the City needs to consider for potential regulations to congregate sleeping areas.

¹ The shelter operators that provided feedback on this project were Hope Mission, Al Rashid Mosque, Youth Empowerment and Support Services, Elizabeth Fry Society of Northern Alberta, NiGiNan Housing Ventures, The Mustard Seed and Enoch Cree Nation.



What We Asked

When deciding what questions to ask participants, the City considered that shelter operators had previously advised that they did not want restrictions imposed on their operations (see the [Review of Findings From Previously Conducted Engagement](#) section of this report). Recognizing that feedback, the City opted to focus discussions on better understanding how operators define congregate sleeping areas and make decisions about them in their shelters, what impacts potential regulations would have on their work and whether there was a preference between the two regulatory options the City was considering. These questions allowed operators to expand on why they were opposed to restrictions, an approach aimed to balance respecting the feedback shelter operators had already provided with the City's responsibility to investigate the issue as directed by Council. To this end, participants were asked the following:

1. [Only asked to shelter operators and GoA] Are you aware of a common standard that defines a congregate sleeping area apart from a semi-private room? How does your organization define these different kinds of sleeping arrangements?
2. [Only asked to shelter operators] Can you explain how your organization makes decisions about the size of congregate sleeping areas in your shelter?
3. What is your preference between restricting congregate sleeping areas based on floor area per person or based on the number of people staying?
 - a. What are the advantages and disadvantages of each option?
 - b. How would these options impact your organization?
4. Do you have suggestions for other approaches to regulating congregate sleeping areas?
5. What needs to be considered when allowing shelters to expand capacity during specific situations, such as extreme weather conditions?

Engagement GBA+ Analysis

A Gender-Based Analysis Plus (GBA+) was conducted during planning to ensure that the engagement process was inclusive of those with diverse and underrepresented experiences. Through this analysis, it was identified that it was important to engage with shelter operators who serve shelter users who are overrepresented amongst those experiencing homelessness (such as Indigenous peoples)² and those who experience elevated/unique safety concerns in accessing shelter services (such as women and 2SLGBTQIA+ people).³ These experiences were reflected in the engagement process, as the City received feedback from two Indigenous-led shelter operators, one youth shelter and one women's shelter operator.

What We Heard

A range of feedback was reviewed and considered in the context of this project, including from previous engagement and from new engagement with select affected groups. Each source is detailed below, with feedback from new engagement analyzed to identify key themes.

Review of Findings from Previously Conducted Engagement

A review of the [Report on Homeless Encampments on Public Land](#) (OrgCode Consulting, 2019) provided important context about the experiences of people sleeping outside and not accessing shelters. For this report, a City-contracted consultant engaged with people sleeping outside in 2019. Through engagement, the consultant found that overcrowded shelters and the lack of personal space they provide was the second-highest reason cited by those who chose not to stay in a shelter and instead sleep outside. This report also referenced research conducted by Homeward Trust which found that being frequently turned away from shelters due to overcrowding was the fourth-highest reason cited by those who sleep outside. A review of [Staying Outside is Not a Preference: Homelessness in Edmonton](#) (MAPS Alberta Capital Region, 2023) provided further insight. For this report, a City-contracted consultant engaged with people sleeping outside in 2022 and found that overcrowding and lack of privacy were among the top three reasons people did not stay at shelters.

These findings from previous engagement show that a shelter's physical layout and spacing can influence the experiences and decisions of those accessing shelter services in complex ways. Shelter users generally prefer less crowded and more private sleeping arrangements; however, the high demand for shelter spaces can make this challenging for operators to provide. At times, a lack of

² <https://homelesshub.ca/collection/population-groups/indigenous-peoples/>

³ <https://homelesshub.ca/collection/population-groups/women-girls-and-gender-diverse-peoples/>

available shelter spaces can lead to people being turned away from their preferred shelter and having to go elsewhere to find a place to stay, reducing the level of choice that shelter users have.

The City also considered findings from their engagement with shelter operators in 2024 through the [Minimum Emergency Shelter Standards Review](#). During this engagement, participants shared that they did not want the City imposing restrictions on shelters. Given that engagement on the Minimum Emergency Shelter Standards was conducted approximately six months before engagement for this project, these findings provided the City with a recent understanding of operators' perspective on the issue.

What We Heard in this Engagement - Shelter Operators

Definition of congregate sleeping areas

Operators generally indicated that there was not a common definition of a congregate sleeping area. They agreed that a congregate sleeping area generally refers to where shelter users sleep in a large open setting and can include the use of cots, bunk beds and/or mats on the floor. There was also general agreement that a private sleeping area is an enclosed room with a door or curtain. There was less agreement about what is considered a semi-private sleeping area. Several shelter operators noted that the presence of half walls or partitions between beds but no doors made a space semi-private, while others felt that half walls or partitions could still be present in a congregate area. In addition, some felt that semi-private areas must have a maximum number of people (for example, eight or fewer people), while most did not specify a maximum occupancy in their description of a semi-private area.

Operators prefer more private sleeping areas but that can be difficult to provide

When asked to explain how their organization makes decisions about the size of congregate sleeping areas, operators shared that they prefer smaller shelters and more private sleeping areas. This aligns with feedback that operators previously provided the City during the [Minimum Emergency Shelter Standards Review](#)⁴. For some operators, that preference has resulted in their decision not to use any congregate sleeping areas⁵. For other operators, although they would prefer to offer more private spaces, congregate sleeping areas remain a necessity in their shelters to meet

⁴ In the What We Heard Report on the Minimum Emergency Shelter Standards Review operators identified their ideal shelter would be smaller (30 to 50 people for program-specific shelters and 100 to 125 people for general shelters) (p. 5). It was also noted that since 2021, there had been an increase in the availability of private and semi-private sleeping spaces in Edmonton's shelters (p. 3).

⁵ During engagement, some Indigenous-led and women's shelter operators shared that they only provide private or semi-private spaces to meet the unique needs of their shelter users.

the demand for shelter spaces and because they may be restricted by existing building layouts, potential site locations and available operating funding. Only one operator expressed a preference for congregate sleeping areas, explaining that this arrangement allows them to better supervise shelter users than if users were divided into more private areas.

"I don't really know anybody that's saying like shelters for like 400 or 800 people are a good idea. I think it's just also related to what kind of like operational funding is available, cost per space, all of that kind of stuff." - Shelter operator

Concerns about the City introducing regulations to congregate sleeping areas

The majority of operators expressed concerns about the City's potential regulations for congregate sleeping areas. While several operators shared that they are supportive of shelters transitioning away from the use of congregate sleeping areas, many did not agree with the City imposing restrictions on their operations as the appropriate way to address this issue. Only two shelter operators were supportive of the City introducing regulations to congregate sleeping areas.

A range of concerns were identified by operators, with the primary concern being that regulations under the Zoning Bylaw would limit operators' flexibility and make it more challenging for them to adapt their operations based on shelter users' needs. Several operators explained how the ability to adjust and expand capacity on an as-needed basis is essential to their operations, especially as the number of people experiencing homelessness in Edmonton continues to rise. This concern about limited flexibility and increased barriers echoes the feedback operators previously provided the City during engagement on the [Minimum Emergency Shelter Standards Review](#).

"We're not in favour of large congregate sleeping arrangements for people who we should be promoting their dignity... but from a practical standpoint, the more regulations we place... it actually becomes more difficult to find a building" - Shelter operator

Related to this is the concern that by limiting operators' flexibility, regulations on congregate sleeping areas could have larger, unintended impacts on Edmonton's homelessness-serving system as a whole. Some operators shared that regulations on congregate sleeping areas could lead to fewer shelter beds in Edmonton overall, as operators have limited space in their existing buildings and face challenges finding other appropriate buildings. For these reasons, several operators were concerned that the potential regulations would exacerbate existing challenges with encampments.

"When you limit it to your space can only go this big, you are really limiting any kind of real estate, any kind of options... as opposed to allowing them [shelter operators] the autonomy and decision to dynamically manage their own spaces." - Shelter operator

Questions and concerns were also raised about the implementation of potential regulations. Several operators asked if regulations would make existing shelters non-conforming and expressed concerns about the time and resources operators would have to spend going through appeals processes and/or searching for alternative locations. There were also questions about how regulations under the Zoning Bylaw regarding the size of congregate sleeping areas would fit with the existing building and fire code regulations that shelters are also subject to. It was flagged that occupancy limits under the fire code apply to all people in the building, whereas limits on the size of congregate sleeping areas would only apply to shelter guests and this could be confusing.

Of the two options that the City proposed for regulating congregate sleeping areas, there was a slight preference for regulating based on the number of people staying. Regulating based on the number of people staying was generally seen as more straightforward, with only one operator preferring the option of regulating based on floor area per person. However, it is important to note that some operators did not prefer either option as they did not support any regulations being introduced and some opted for regulating based on the number of people staying as the "least bad" rather than a good option. One operator pointed out that both options still do not address concerns about shelter standards, including the lack of minimum spacing requirements between shelter beds.

"Sometimes processes like this can make operators feel as though the work they're doing is sort of looked down upon, and in reality, it is such a structural issue that we are dealing with." - Shelter operator

A sentiment shared by several operators is that shelter operators in Edmonton are doing the best they can, under challenging circumstances, to provide dignity to shelter users. These participants expressed a desire for operators to be trusted in their decisions around congregate sleeping areas, as they are the experts in delivering shelter services. In addition, many participants voiced concerns about how the City's focus on regulating congregate sleeping areas could distract from what they saw as the more meaningful work of increasing affordable and supportive housing.

"I think there are better ways to have this conversation than through zoning and regulations." - Shelter operator

Importance of expanded shelter capacity during extreme weather and emergencies

The majority of operators agreed that if the City introduced regulations, they must allow for shelters to expand their capacity and exceed regulations during certain situations, such as extreme weather and emergencies. Several operators noted that it would be challenging to regulate allowing shelters to exceed their capacity, as the kinds of situations that warrant this exemption are varied and complex. For example, some noted that in addition to extreme cold and heat events, shelters may experience an increased need for their services during rainy weather and poor air quality. For this reason, several operators were opposed to any kind of restrictions during extreme weather events and other emergencies.

"There always needs to be a contingency plan... so that it doesn't always result in having to go back for a permit change [to expand shelter capacity when needed]" - Shelter operator

What We Heard in this Engagement - Government of Alberta (GoA)

The GoA shared that they did not support the City introducing any kind of regulations on congregate sleeping areas and expressed a variety of concerns. Similar to shelter operators, the GoA's primary concern was that regulations could create barriers for operators and lead to a range of larger impacts on Edmonton's homelessness-serving system. For the GoA, these larger impacts include reduced overall shelter capacity that could lead to increased homelessness, encampments and shelter users having a hard time accessing support. The GoA also expressed concerns about regulations making existing shelters non-conforming, creating operational cost inefficiencies (reducing the size of congregate sleeping areas making it more expensive to support shelter users on a per-person basis) and potentially discouraging the development of new shelters in the future.

What We Did

In response to feedback, the City is taking the following actions:

- Aligning the project's definition of congregate sleeping areas with criteria that were generally agreed upon by participants.
- Communicating to Council that most shelters in Edmonton are supportive of moving away from the use of congregate sleeping areas; however, for some there are barriers outside of their control that make this difficult to change.
- Communicating to Council the various concerns and risks if the City introduces regulations to congregate sleeping areas, namely limiting operators' flexibility and the potential negative impacts this could have on Edmonton's homelessness-serving system.

- Proposing regulations that ensure shelters can exceed their capacity for up to 90 days in the event of extreme weather or other emergencies or until the end of the event, whichever is less.

Next Steps

A report will go to the Urban Planning Committee on April 1, 2025 outlining the City's recommendations for proposed amendments to Bylaw 20001. All engagement participants will be notified when this Council Report is publicly available.