

Federation
of Citizens'
Associations
of Ottawa

fca-fac

Fédération
des associations
civiques
d'Ottawa

March 12, 2025

Sent via email to:

Solé Soyak

Development Review Planner

Planning, Development, and Building Services Department

City of Ottawa

110 Laurier Avenue West, 4th Floor

Ottawa, ON K1P 1J1

Sole.Soyak@ottawa.ca

Reference: Zoning By-law Amendment (File No. D02-02-25-0011)

Dear Solé Soyak,

The Federation of Citizens' Associations (FCA) is pleased to bring to your attention its perspectives regarding the proposed amendment to the shelter zoning bylaw. We acknowledge the urgent need to address homelessness in our city and we continue to call for a Housing First approach with City resources focused on this goal.

The FCA supports the City's efforts, outlined in the Housing and Homelessness Plan, to divert the homeless, especially families, from emergency shelters and at least provide safe and secure transitional shelters to minimize emergency shelter needs and provide better outcomes for both singles and families. Transitional shelters should reduce the delays in obtaining housing while providing better support for the homeless who need social and health services.

The proposed emergency and transitional housing bylaw needs to define the land use proposed pursuant to the Official Plan, and the bylaw needs to be clear that it includes, where appropriate, shelter use that is now variably described as residential care facility (eg Corkstown), safe distancing centre, newcomer reception centre and overflow centre (Grandmaitre Arena) etc. The FCA welcomes Council's amendment to the Leiper motion to direct staff to ensure a review of definitions in its response.

Equitable Distribution: The Official Plan provides for emergency and transitional shelter throughout the urban area with no limits to concentration, nor direction how shelter use anywhere in the City will be regulated beyond the relevant residential, mixed, general, traditional and arterial mainstreet and institutional zoning provisions. There is no provision for equitable distribution, limits on clustering/concentration, nor policies to ensure appropriate community integration as required under the Provincial Planning Statement.

The FCA believes that shelters should be equitably distributed throughout the City to meet the needs of the homeless in their communities throughout Ottawa, together with other housing supports, including supportive housing. In the new zoning bylaw, staff have committed to equity among neighbourhoods. We urge the city to engage in a transparent process to define metrics and ensure fairness in shelter distribution, with particular attention to preventing overburdening of already vulnerable neighborhoods.

Shelter Size: The effectiveness of smaller versus larger shelters may be a subject of debate. We recommend an approach that considers the local context, client needs, and available resources when determining shelter size, with adequate funding and resources for comprehensive services. The relevant zoning where shelter use is to be permitted, not unlike the schedule for senior residents, is expected to provide for typologies, size, height and accessory use, among others. Supportive housing which is covered by the provincial Residential Tenancies Act is already typically regulated as apartments to ensure adequate interior and outdoor amenity space for residents. Provision is made for medical services and security.

Provisions for transitional housing, not covered by the Residential Tenancies Act may require similar provisions under zoning consistent with the City's Transitional Shelter Standards and residential care facility use as applicable. Under the zoning bylaw schedule, emergency shelters need specific provisions for such typology. There are specific requirements for homeless clients, including support services, security and indoor and outdoor amenities. To manage external impacts within the community, zoning also needs to address additional performance standard under the bylaw: the number of beds (ie ZBLA for 333 Montreal Rd) and mitigate and better integrate shelter facilities in Ottawa's communities, taking into account security (CPTED II), need for local "ambassador" and outreach services (cf ZBLA, Holding bylaw provision and SPC agreement for 333 Montreal Rd) and take into account the scale of deliveries, garbage storage and other building services which have potential neighbourhood impacts. These may include requirements for minimum lot size, building design and outdoor space including soft landscaping and trees.

Approval Process: The requirement for added performance standards for the shelter typologies entails a robust site plan control process and agreement in the context of a Delegated Authority Report. It requires public consultation, on-going community engagement and removal of

delegated authority by the Council as appropriate. While streamlining approvals is desirable, we caution against sacrificing thorough planning and community engagement for the sake of speed. We propose a balance that maintains on-going transparency and accountability while ensuring timely approvals.

Prioritization of Permanent Housing: We strongly support a "Housing First" approach and urge the city to prioritize permanent community housing solutions while recognizing the need for emergency and transitional shelters, transitional housing and supportive housing, as part of the continuum towards providing the homeless a home.

Community Engagement: We emphasize the importance of robust community engagement, education, and proactive strategies to address community concerns, and continued monitoring to mitigate potential conflict. Open communication and collaboration between shelter operators, residents, and the broader community are essential.

Suggested Way Forward

We propose the following way forward to allow shelters in all urban areas while addressing community concerns:

- **Ensure appropriate clarity under the bylaw of definitions for emergency and transitional housing, as directed by Council:** Undertake analysis of appropriate typologies based on existing context and taking into account current and future zoning.
- **Develop Clear and Transparent Equitable Distribution Policies:** Establish specific guidelines and metrics for equitable shelter distribution, ensuring that no single neighborhood is disproportionately burdened. This includes more specific direction under the City's Housing and Homelessness Plan and the budgetary process. Ensure compliance and community updates of the Emergency Shelter Standards and the Transitional Housing Standards.
- **Implement a Context-Sensitive Approach to Shelter Size and Use:** Consider the specific needs of the local client population and available resources when determining shelter size, ensuring adequate funding and comprehensive services in the context of City emergency and transitional housing standards, policies and oversight.
- **Provide for Council consideration appropriate zoning performance standards:** This includes an outline of site plan control process, holding provisions and ensuring appropriate client amenity spaces and safety, as well as measures to mitigate negative impacts including ambassador and other programs as appropriate to project and its scale.

- Streamline Approvals While Maintaining Community Input: Balance the need for timely responses with thorough planning, especially site plan control and meaningful community engagement.
- Prioritize Permanent Housing Solutions: Adopt a "Housing First" approach while ensuring that shelters serve as a bridge to permanent housing, not a long-term solution. This includes for more supportive housing as well as increased number of rooming houses as part of neighbourhood zoning where appropriate.
- Foster Robust Community Engagement: Implement proactive strategies to engage diverse communities, address concerns, and promote positive relationships between shelter residents and the broader community.

We believe that by working together and considering these diverse perspectives, we can develop a comprehensive and compassionate approach to addressing homelessness in our city that benefits all residents.

Sincerely,

Paul Johanis, Chair

Federation of Citizens' Associations