

Town of Milton

Supportive Housing Study

CONSULTATION SUMMARY REPORT

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1.0 INTRODUCTION

The Town of Milton retained MacNaughton Hermsen Britton Clarkson Planning (“MHBC”) and SHS Consulting to undertake a review of the Town’s Official Plan and Zoning By-laws to identify gaps in the framework and provide recommendations to improve the framework and ensure compliance with Provincial policies and legislation.

The first phase of this work involved background research, specifically:

1. A review and analysis of the legislative authority with respect to the municipal regulation of inclusionary and supportive housing;
2. A review and analysis of the Town’s current planning framework as it relates to supportive housing; and,
3. A Best practice review of how other municipalities have responded to Provincial changes related to supportive housing in their Official Plans and Zoning By-Laws.

To augment this background research and to ensure that recommendations are suitable for the local context, consultation activities were undertaken with key stakeholders who are involved in providing supportive housing, as well as Town of Milton residents.

1.1 Consultation Approach

Meetings were undertaken with key stakeholders on October 17th and 18th, 2017 to obtain a better understanding of the Town’s current policies and regulatory framework related to supportive housing and identify areas for improvement from the perspective of housing and support service providers and other key stakeholders. In total, eight people attended the stakeholder meetings representing five different organizations. A copy of the stakeholder interview questions and presentation is included as **Appendix A** to this report. A summary of the key findings from these meetings is provided in the following section.

In addition, two approaches were used to obtain input from Town of Milton residents. First, an online public survey was undertaken from October 19th to November 5th, 2017. The purpose of this survey was to better understand the need for supportive housing in Milton and to obtain residents’ input on where supportive housing should be permitted and how these dwelling types should be regulated by the Town. The survey was administered using Survey Monkey and the Town promoted this survey through an ad in the local newspaper as well as through social media. A total of 210 people responded to this survey, with 205 respondents being Town residents. A summary of the key findings from the

online survey is presented in the following section and a copy of the survey questions can be found in **Appendix B**.

In addition to the online public survey, a public open house was conducted on November 1st, 2017 to offer Town residents another opportunity to provide their input. This public open house was also an opportunity to increase awareness of the need for supportive housing in the Town as well as the different forms of supportive housing. Advertisement of the open house was provided in the local newspaper and online via the Town's website. A total of six members of the public attended the open house. A summary of the key findings from this public open house is presented in the following section and a copy of the presentation and discussion questions can be found in **Appendix C**.

2.0 WHAT WE HEARD

This section presents a summary of the key findings from the consultation activities undertaken.

2.1 Public Online Survey

The survey questions were developed to identify the need for supportive housing in the Town, determine whether residents felt these dwelling types should be regulated differently from other dwelling types, and where these dwelling types should be permitted to locate. The following are the key findings from the survey.

There is a need for supportive housing options for seniors and persons with disabilities.

Survey respondents were asked to select the three types of supportive/ special needs housing that they felt were most needed in the Town. A total of 130 responses were received while 80 responses were left blank. The results suggest that respondents were predominantly concerned about supportive housing options for seniors and persons with disabilities.

Table 2: Supportive Housing that is most needed in Milton

Supportive Housing Types	Number	Percentage
1: Independent homes or apartment units with accessibility modifications for persons with disabilities and/or the aging population	92	24.9%
2: Group homes or shared housing for older adults/seniors	76	20.6%
3: Independent housing units in buildings where support services are provided	71	19.2%
4: Group homes or shared housing for persons with physical disabilities	33	8.9%
5: Group homes or shared housing for youth with special needs	32	8.7%
6: Group homes or shared housing for persons with mental health issues and /or substance abuse/addiction issues	30	8.1%
7: Group homes or shared housing for persons with developmental disabilities	26	7.0%
8: Other	9	2.4%
Total	369	100.0%

Source: Milton Supportive and Inclusive Housing Survey 2017

Supportive housing should not have to meet requirements beyond those of other dwellings.

The respondents were also asked if they thought supportive housing that is shared by three or more people and may be receiving support services should

have different requirements in the Town's Official Plan and Zoning By-law compared to other dwelling types.

The data showed that almost 40% thought that different requirements for supportive housing were not necessary while over a fifth believed that it was necessary.

Table 3: Specific Requirements for Supportive Housing

Response	Number	Percentage
Yes	44	21.0%
No	83	39.5%
Blank	83	39.5%
Total	210	100.0%

Source: Milton Supportive and Inclusive Housing Survey 2017

Of the respondents who felt specific requirements in the Official Plan and Zoning By-laws were necessary, 50% noted that it is important to acknowledge people with special needs have different requirements than the general population in terms of accessibility and needs for services. These respondents thought this should be taken into account to make sure people with special needs can live in supportive and safe environments (see table below).

Another group of respondents (9.1%) thought that certain special needs groups such as people facing mental health issues and substance abuse issues should be more secluded to protect themselves and the neighbourhood. A small group of respondents (4.5%) thought it was important that regulations ensure that the character of neighbourhoods be maintained.

Table 4: Reasons Given for Having Specific Requirements for Supportive Housing

Response	Number	Percentage
1: People with special needs are different from the general population and have different needs for supports. This should be taken into account so residents with special needs are cared for and live in a safe supportive environment.	22	50.0%
2: People with mental health and/or substance abuse issues might need more seclusion to protect the neighborhood and the residents themselves	4	9.1%
3: The character of the neighborhood should be maintained	2	4.5%
4: Other comments (no specific pattern)	16	36.4%
Total	44	100.0%

Source: Milton Supportive and Inclusive Housing Survey 2017

Supportive housing should be permitted in all areas of the Town.

Almost 43% of respondents stated that supportive housing should be allowed in all areas of the Town. A similarly large group indicated they had no opinion and left the question blank (41%). A small group of 9.5% indicated supportive housing should only be allowed in the urban areas of the Town and 6.7% mentioned

supportive housing should only be allowed in certain areas of the town (see table below).

Table 5: Where Should Supportive Housing Be Allowed in Milton

Response	Number	Percentage
Supportive housing should be allowed in all areas of the Town	90	42.9%
Supportive housing should only be allowed in the urban areas of Milton	20	9.5%
Supportive housing should only be allowed in certain areas of the town	14	6.7%
Blank	86	41.0%
Total	210	100.0%

Source: Milton Supportive and Inclusive Housing Survey 2017

For the respondents who stated that supportive housing should only be allowed in certain areas of the Town, 71.4% indicated that it is important for supportive housing to be located near services and amenities to foster independence and inclusion. A smaller group of 14.3% indicated people with mental health issues and/or substance abuse issues should be living more remotely to protect themselves and the neighbourhood.

2.1.1 Additional Comments

Survey respondents were given a chance to share any additional comments they may have. While the majority (83.3%) did not add any other comments or skipped the question, some respondents left some final thoughts which have been summarized in the table below.

Of those leaving a response, the majority mentioned more inclusivity for supportive housing in Milton is necessary, while a smaller group of residents mentioned supportive housing should be allowed everywhere in the Town, as long as special provisions are in place to take care of this population that is often more vulnerable.

Table 6: General Themes of Additional Comments

Additional Comments	Number	Percentage
We need more inclusivity in housing options in Milton	17	8.1%
Supportive housing should be allowed everywhere but special provisions should be in place	8	3.8%
Supportive housing should not be allowed in all areas of the town	3	1.4%
Other	7	3.3%
Blank/no additional comments	175	83.3%

Total	210	100.0%
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Source: Milton Supportive and Inclusive Housing Survey 2017

2.2 Key Stakeholder Meetings

During these sessions, key stakeholders were asked about the current and emerging need for supportive housing in Milton. They were also asked about the current definitions in the Town's Official Plan and Zoning By-laws. In addition, the elements of the current municipal policy framework were explored, with key stakeholders and participants being asked what was working and what, from their perspective, needed to be amended.

The participants at both key stakeholder meetings identified a significant gap in housing options for persons with special needs. While there were unique needs related to the different population groups, in general, the housing gaps were related to the unaffordability of housing, the very limited supply of accessible housing options, and the type of housing available. Some key stakeholders also mentioned issues related to discrimination of realtors, landlords and neighbours against the clients they serve.

It was also noted at these sessions that Milton is growing at a much greater rate compared to the province as a whole. Milton's population is also aging and the number of people with some form of disability is increasing. While stakeholders noted that Town Councillors and Staff have done a good job in trying to keep up with the increasing needs and issues related to the growth of the population, any housing strategy, including supportive housing policies and regulations, need to take this growth into account as it is expected to continue into the future.

The following overarching themes have been identified based on the responses from key stakeholders.

There is a lack of justification for separation distances between group homes.

The current Zoning By-laws require a separation distance of 500 metres between two group homes. However, all the participants of the stakeholder meetings agreed that this requirement was unreasonable and should be removed. Participants also noted that the separation distance requirement creates an additional challenge considering the very limited supply of affordable and appropriate housing.

There is a need to revise the current definitions to allow for flexibility.

The participants to the key stakeholder meetings all agreed that the current definitions should be made broad enough to allow for flexibility in housing forms. Participants noted that the current definitions are no longer appropriate for the different supportive housing forms that are currently being required and that are being developed.

In addition, participants stated that the different categories for group homes were no longer appropriate. They felt that having the different categories increased confusion and were discriminatory in nature. However, some participants noted that there may be some value in differentiating between temporary and permanent accommodation.

Further, some participants indicated that including a requirement for provincial funding and/or supervision in the definition for supportive housing was no longer appropriate. For example, some supportive housing facilities do not receive any funding from the province. As such, these dwelling types would not fall within the current definitions despite the fact that they are housing options for people requiring some form of support.

The current definitions in the Official Plan and Zoning By-laws specify a certain number of residents that are permitted in these supportive housing facilities. However, participants at the key stakeholder meetings stated that these numbers seem arbitrary and do not necessarily reflect the need. It was brought up that, in some cases, it may be beneficial to have more than ten people living together and receiving supports as there is peer support in addition to the support provided by personal and health care workers. In other cases, a maximum of five people in one home is best given the complexity of need. As such, participants suggested removing this requirement and allowing housing providers to decide the most appropriate number of residents for their housing facility based on the needs of their residents, the ability of staff to provide support services, and the size of the dwelling itself.

The participants to the key stakeholder sessions also noted that any changes made to the definitions in the Official Plan should be made to the Zoning By-laws to ensure that these documents match and are consistent.

Supportive housing should be allowed to take different forms.

The current policies and regulations require that supportive housing be in single detached dwellings. However, key stakeholders stated that single detached dwellings are no longer the most appropriate form based on the changing needs of the clients they serve as well as the changing housing market in the Town.

House prices in Milton, as in other communities, have been increasing and this presents a barrier to developing supportive housing. In addition, some participants at the stakeholder meetings noted that they have encountered discrimination from realtors who will not sell to community agencies serving persons with disabilities or who require that they disclose this to the neighbours in the area.

Participants also stated that a shift to increased densities and multi-residential dwellings is happening to accommodate the rapid growth of the Town as well as to comply with provincial requirements. As such, the Town's policies and regulations should allow for changes in the form of supportive housing to reflect the changing housing market.

Participants at the key stakeholder meetings also noted that, in many cases, single detached homes are no longer the most appropriate housing form for the clients they serve. For example, some community agencies are able to support people living in condominiums, basement apartments, or purpose-built rental apartment buildings. As the need for supportive housing options has increased, there has also been an increased awareness of the unique needs of different population groups. Requiring supportive housing to be located only in single detached homes ignores these unique needs.

Consistency across planning documents and among the various levels of government is needed.

Key stakeholders who participated in the meetings noted some differences between the policies and definitions in the Town's Official Plan and Zoning By-laws. As such, there is a need to ensure consistency across all relevant planning policy documents.

In addition, participants stated that there was a need to ensure a consistent approach to implementing these documents. As such, while there is a need to make definitions and policies more broad and flexible, these should not be as broad as to result in inconsistent implementation based on how each Town staff member interprets the policies and regulations.

Key stakeholder participants also noted that there were some issues with regard to the Region's policies related to supportive housing. This highlights a need to re-examine the Region's policies to ensure they do not act as barriers to the provision of supportive housing.

There is a need for more flexibility in where supportive housing is permitted to locate.

The current Official Plan and Zoning By-laws permit supportive housing in low and medium density residential areas as well as in some rural and Hamlet Commercial areas. However, stakeholder participants stated that supportive housing should be permitted in all areas where dwellings are permitted. The different groups have unique needs and just as there should be flexibility in defining supportive housing and the type of dwelling this is, there should also be flexibility on where these dwellings can locate. For example, one stakeholder noted that, for the population group they serve, the ideal location is close to transit and other services. On the other hand, another stakeholder noted that for the population group they serve, they have found that being in a remote, rural area is best.

Requiring licensing for supportive housing is not appropriate although some form of oversight is still required.

All the stakeholder participants agreed that it was not appropriate for the Town to license supportive housing as the Town does not have the capacity to assess whether the care and support being provided was appropriate. Stakeholders believed that licensing by the province or other, recognized, professional bodies

was more appropriate. However, stakeholders did note a need for some form of oversight of supportive housing dwellings, such as a registration process.

2.3 Public Open House

To better understand the perspective of Town residents with regard to supportive housing, attendees at the public open house were asked about the appropriateness of the current definitions and policies in the Town's Official Plan and Zoning By-laws, the need for licensing or registration of supportive housing facilities, and where these housing options should be allowed in the Town.

The following overarching themes have been identified based on the discussion with participants at the public open house. While some caution should be exercised in interpreting these responses due to the small size of the group and many who were from the same organization, these findings supplement the results from the key stakeholder meetings and public online survey.

There is a need to remove separation distances between all forms of supportive housing.

Similar to the findings from the key stakeholder sessions, participants stated that separation distances between supportive housing facilities should be removed. Those in attendance agreed that people should be able to live where they wanted and that neighbours did not have the right to dictate who lived in their neighbourhoods. It was also noted that separation distances acted as another barrier to social integration.

There is a need to revise the current definitions to allow for flexibility.

Participants stated that the different categories in the current Official Plan Policies and Zoning By-law regulations no longer make sense in the current context. These categories have the effect of discriminating against certain groups of people. It was agreed that having one overall definition for supportive housing would work best.

In addition, a majority of those in attendance stated that the requirement around funding and/or supervision from the province in the current definitions were no longer relevant and should be removed.

It was also noted that the required number of people for each supportive housing facility no longer made sense. Similar to what stakeholders stated, residents felt that the needs of supportive housing residents, the size of the home, and the ability of support service providers to provide supports were the elements that should dictate the number of residents for each supportive housing facility.

There is a need for more flexibility in where supportive housing is permitted to locate.

Similar to the input from key stakeholders, participants at the public open house stated that supportive housing should be permitted in all areas where dwellings are allowed. It was also noted that there should be flexibility in where supportive

housing is permitted to allow housing providers to decide which locations would best serve their client groups.

Requiring licensing for supportive housing is not appropriate although some form of oversight is still required.

Similar to the feedback from key stakeholders, public open house participants all agreed that the Town should not license supportive housing as it does not have the expertise to regulate the care and support being provided to supportive housing residents. Residents did state that registration was a good idea to help the Town keep track of where these dwellings were located (e.g. rural or urban).

2.4 Summary of Engagement Activities

The following is a summary of the findings from all the consultation activities undertaken for this study.

- Supportive housing should not have to meet requirements beyond those for all other dwellings.
- Supportive housing should be permitted in all areas where residential uses are permitted.
- Official Plan policies and Zoning By-law regulations should be updated to remove the requirements related to separation distances.
- The current definitions in the Official Plan and Zoning By-laws should be revised to allow for more flexibility
- It may be beyond the Town's land use planning responsibility and expertise to license supportive housing, although some form of oversight should be required.
- There should be consistency across all Town and Regional planning documents related to supportive housing and consistent interpretation and application of these.

The following practices in other jurisdictions were mentioned during the consultations and should be considered when developing recommendations.

Promising Practice: Town of Markham Official Plan

The Town of Markham's Official Plan has policies related to affordable and shared housing. Shared Housing is defined as "a form of housing where individuals share accommodation either for economic, support, long term care, security, or lifestyle reasons. In some cases, shared housing has no support services attached, such as students, seniors, or other unrelated individuals choosing to live together to share the cost and/or maintenance of housing. In other cases, shared housing may have various levels of support and services for persons with special needs which may include assistance with daily living, housekeeping, counselling, medication, etc."¹

¹ Markham Official Plan Section 4.1.3.

https://www.markham.ca/wps/wcm/connect/markhampublic/00ad1cf0-2da1-4d64-be50-12d406a51df5/20170421-OP_2014-Chapter-4-Final-Strickout-Region.pdf?MOD=AJPERES&CACHEID=00ad1cf0-2da1-4d64-be50-12d406a51df5

Promising Practice: City of Sarnia Zoning By-law

In 2010, Sarnia made the following changes to its Zoning By-law:

- The distancing requirements for all group homes were removed;
- The requirement that group homes with more than five residents be located on an arterial or collector road was removed;
- Group homes are now included in all zones allowing residential use;
- Residential care facilities are a permitted use in any residential zone².

Local Comparator: City of Burlington

The City of Burlington recently implemented Official Plan Amendment 55, which revised the definition of Group Home in the Official Plan as follows:

“A single housekeeping unit supervised by staff on a daily basis which provides special care and treatment to persons for physical or mental deficiency, physical handicap or other such cause. A Group Home shall be funded, licensed, approved, or supervised by the Province of Ontario under a general or specific Act, for the accommodation of not less than 6 and not more than 8 residents, exclusive of staff. Where a Group Home is located outside the Urban Planning Area boundary as indicated on Schedule B, the maximum number of residents permitted, exclusive of staff, is 10. A Group Home may contain an office provided that the office is used only for the administration of the Group Home in which it is located”

The City's Zoning By-law separates group home and correctional group home and includes the following regulations for group homes (General Provisions, 2.21 (g):

- Permitted in a dwelling unit (in all zones)
- In RNA1, RNA2 and RNA3 zones, lots shall have a minimum 30 m lot width and 0.3 ha lot area
- In apartment buildings over 3 storeys one group home is permitted for each 30 units and subject to one Group Home per floor
- Minimum distance between Group Home properties: 400m
- Minimum distance between a Group Home property and a Correctional Group Home property: 400 m

It is noted that while this definition and some of the regulations are progressive, others may be discriminatory in nature (e.g. separation distance)

² Ontario Human Rights Commission (2012). In the zone: Housing, human rights and municipal planning.

3.0 CONCLUSION

The analysis of demographic data as well as the results of the consultation activities show that there is a need for supportive housing options in the Town of Milton. While the most pressing need appears to be options for an aging population, there is definitely a need for supportive housing for different population groups, including people with physical disabilities, mental health issues, developmental disabilities, youth, and substance abuse issues.

The results of the consultation activities show that current policies and regulations need to be revised to allow for more flexibility with regard to supportive housing while maintaining good planning principles. In addition, the consultation findings show a need to remove any policy or planning barriers related to supportive housing, including barriers to more innovative approaches to providing supportive housing.

As a next step in the study process, draft recommendations will be developed on changes to the Official Plan policies and Zoning By-law regulations. While the results of the consultation activities are an important consideration in developing these recommendations, the recommendations will also be based on the background review, which includes an analysis of provincial and municipal policies and legislation, as well as the scan of best practices in other jurisdictions.

Appendix A

Stakeholder Discussion Questions

Need for Special Needs Housing

1. In your experience, are there any gaps in special needs housing options to meet the needs of the clients you serve and Town residents with special needs in general?
 - a. If yes, what special needs housing options are required but are currently not available or are very limited?
 - b. Is there a group that is in particular need?

Existing Policies

2. Looking at the current definitions of group homes, special needs housing, and residential care facilities from the Town's Official Plan and Zoning By-laws, do you see any issues with these definitions?
 - a. Is there a better way to define these terms?
 - b. Are there any other special needs housing forms that should be defined in the Official Plan and Zoning By-laws?
3. If you were to establish a group home or special needs housing now, what elements of the current policy framework, including Official Plan and Zoning By-law policies, are working/supportive?
4. What elements of the current policy framework/process present challenges/barriers to building special needs housing in the Town?
5. If you could design an ideal policy framework/process that is supportive of the development of special needs housing in Milton, what would it look like?
6. Are there other actions the Town should be implementing with regard to its group home and special needs housing policies?
7. Are you aware of any best practices in other jurisdictions with regard to the planning and approval of group homes and special needs housing? If so, please explain
8. Do you have any additional comments/information you would like to share?

Appendix B

Public Survey Questions

1. Do you currently live in Milton? If you don't, where do you live?
 - Yes
 - No, I live in _____

2. The data on Milton's current population shows the need for supportive and special needs housing is increasing and will continue to increase in the future. Thinking about this need for supportive and special needs housing in the Town, please check the top three (3) options that you believe are most needed in Milton today and in the next five years.
 - Group homes or shared housing for older adults/seniors
 - Group homes or shared housing for persons with physical disabilities
 - Group homes or shared housing for persons with developmental disabilities
 - Group homes or shared housing for persons with mental health issues and/or substance abuse/addiction issues
 - Group homes or shared housing for youth with special needs
 - Independent homes or apartment units with accessibility modifications for persons with disabilities and/or the aging population
 - Independent housing units in buildings where support services are provided.
 - Other (please explain) _____.

3. In your opinion, is there a need for the Town's Official Plan policies and Zoning By-law regulations to have different requirements for the following types of housing?
 - Housing that is shared by three or more people who have special needs and who may be receiving support services
 - Housing that is shared by three or more people because they cannot afford housing on their own
 - Housing occupied by people who are related/part of a family and who are receiving support services
 - No, the Town's policies and regulations should not distinguish among these types of housing.
 - Yes, there should be different requirements for these different types of housing because (please explain) _____.

4. One of the housing goals in the Town's Official Plan is to encourage an inter-mixing of housing forms and types within neighbourhoods to foster community integration³. Keeping this in mind, do you think special needs housing should only be allowed in certain areas of the Town, such as urban areas with services, or should special needs housing be allowed in all areas of the Town where single detached homes are allowed or currently exist and as long as they meet health and safety standards and have the community services required?

³ Town of Milton Official Plan, Sec. 2.7.1

- Special needs housing should only be allowed in urban areas of Milton.
- Special needs housing should be allowed in all areas of the Town if they meet health and safety standards.
- Special needs housing should not be allowed in Milton.
- Special needs housing should only be allowed in certain areas of the Town, such as (please identify) _____.

5. Do you have any further comments about the study that you would like to share? _____

6. Would you like to receive updates on this study and/or be invited to future consultation events? If you do, please provide us with your contact information.

Name _____

Email _____

Appendix C

Open House Discussion Questions

1. Do we need different categories and different definitions for supportive/special needs housing in Milton? If so, how should the current definitions and categories be revised?
2. Where should supportive/special needs housing be permitted within the Town?
3. Should the Town continue to license or register supportive/special needs housing?