

Standing Committee Comments & Questions

The Community Infrastructure and Strategic Growth (CISG) Standing Committee reviewed the proposed supportive housing amendments at their meeting on December 10, 2024. The discussion focused on four (4) main topics; public engagement, fire/emergency safety, business licensing, and assessment.

The Committee accepted [Administration's report](#) for information and endorsed Bylaw B-33/2024 unanimously. Some of the questions/comments discussed by the Committee are listed below. Staff responses are included, along with supplementary information added post-meeting:

1. Public Engagement (may vs shall language)

The Committee began the question period with a discussion whether public engagement/notification by the supportive housing applicant/operator should be required to be conducted prior to application submission or not.

Administration Meeting Response:

Within the proposed policy amendment language, Administration has recommended that proof of completed engagement and/or notification of properties within a 60m radius of the subject property 'may' be required with the submission of a development permit application.

This approach was purposely chosen to be left to the discretion of the Development Authority. Administration went into further detail, explaining four (4) reasons the Development Authority may not want to mandate engagement:

- 1) May lead to the misconception that the engagement is part of the review/evaluation process of the application itself, which is not the case. It could be seen as leading to a bias in the Development Authority's professional opinion and/or fetter their future discretion.
 - a. It is felt that encouraging applicants to conduct a form of engagement/notification in a good neighbour way is a means to build trust with folks and provide a medium to address concerns throughout facility operation.
- 2) May lead to the broadcasting of what an application proposal is at its inception, without the neighbours knowing the context of changes the Development Authority may have required for approval. There could be multiple iterations of the proposal before it is approved, which could lead to differing knowledge within the neighbourhood.
- 3) May lead to misconceptions or misunderstandings of the applicant themselves. There could be scenarios where an applicant has submitted a proposal, but after Development Authority review and potential requests made, the applicant may decide not to proceed and withdraw their application. Not mandating engagement can be seen as a way to protect the applicant.
- 4) There is already a legislative process in place through the Subdivision and Development Appeal Board (SDAB). The Development Authority makes a decision based on their understanding of the regulations that exist and the merits of the application to manage potential impacts. The SDAB process is specifically in place to afford an entirely new (de novo) review of the application should someone believe this was done incorrectly and wish to appeal a decision of approval.

Lastly, it was discussed by the Committee that requiring engagement from people who are not public engagement experts could pose additional risks and/or more problems than it may solve and how it will be challenging to get consistent approaches. It was mentioned if there was some way to make the format of engagement consistent among applications that may be of better benefit.

Administration Additional Context Response:

Not required.

2. Public Engagement Strategy

Committee members asked for clarification on the public engagement strategy that was utilized by Administration during the review of current supportive housing regulations, including why did we not include everyone who signed up, why did we screen interested respondents, what disqualified them respondents, etc.

Administration Meeting Response:

Due to supportive housing being an inherently sensitive/contentious topic with perhaps frequent misinformation, Administration felt that it was best to have an approach focused on small group dialogue (groups larger than 10 people tend to experience disengagement from participants). The small groups were selected to include a diversity of perspectives by balancing self-reported demographics such as gender, age, household income, identifying as a visible minority, and location of residence in the city (i.e. NW, SW, NE, SE, Central). The focus groups were then organized by sentiment towards (comfortable with, no strong feelings one way or the other, and not comfortable with) supportive housing and experience with (work, live, or know someone who works or lives in) supportive housing.

Administration Additional Context Response:

Not required.

3. Fire/Emergency Safety

Committee members discussed the topic of fire and emergency safety for people living in supportive homes and those living in the community. Specific questions were asked regarding any requirements through the development permit, business license, or other regulatory body to have or post a fire/safety plan.

Administration Meeting Response:

A fire safety plan is not a requirement of the development permit nor a business license. However, it is understood that it would likely fall under the purview of the Province as it relates to the operation of the supportive housing facility itself. The planning team has had the opportunity to visit existing *Supportive Housing, Limited* facilities in Airdrie where all had these plans posted on all levels of the home.

Administration Additional Context Response:

Through the lens of the development permit (Land Use Bylaw), business license, and Fire Department, a supportive housing facility (at the limited scale) is considered and remains residential in nature. It is not seen as a commercial business where these more specific requirements are inspected and enforced. A supportive housing use is treated similar to a home-based business, meaning safety code and fire inspections are not conducted. However, having a fire/emergency safety plan and fire extinguisher located within the home is always strongly encouraged and is typically a review comment shared with the applicant at the development permit stage.

4. Business Licensing

Committee was curious as to how the business license process works, what it entails, and how oversight of facilities occurs when they do not require a development permit or provincial licensing.

Administration Meeting Response:

Regardless of how many residents or clients are living within a supportive housing facility, the operator is always required to have a valid business license. Additionally, if there is a facility that will operate with 2 or fewer residents (which would not require a development permit with the proposed regulations) there will always be provincial oversight in terms of the facility needing to be in compliance with the [Continuing Care Act](#) and its regulations and [Accommodation Standards](#) for example.

Administration Additional Context Response:

There is currently nothing in our business license bylaw that requires a supportive housing applicant/operator to submit any type of provincial government documentation. Further to the above, the bylaw considers supportive housing use residential in nature and are treated similar to a home-based business where they both go through the same process and procedure. A business license for these uses does not require safety inspections or occupancy permits. These are only required for commercial uses.

5. Assessment

Committee inquired about the assessment value of a property once an applicant has a valid development permit and business license for a supportive housing use.

Administration Meeting Response:

While Administration may see the operators as businesses and require a business license, we still consider the use residential in nature. For that reason, Administration did not anticipate that there would be a change in the assessment value.

Administration Additional Context Response:

For confirmation (in the *Supportive Housing, Limited* context), where the facility is owned by a not-for-profit tenant/business, the entire property becomes exempt from property taxes. If the property is owned by a for-profit tenant/business, then the property continues to be valued and taxed as a residential property as that remains the primary use.