

Sunnyside Project – Council Response – Municipal Plan Amendment

November 28, 2024

Introduction

This response provides Council with the views and concerns from a group of interested and concerned people who have businesses located around the proposed Sunnyside tiny homes community. Collectively our businesses employ hundreds of employees and contribute significantly to the City's tax base. The establishment of a tiny home community has the potential to serve the City well but is not without its risks and potential impacts on the community which must be considered carefully, including the location of such a development.

These considerations include:

- Alignment with the City's Municipal Plan
- Security
- Mixed Income Environment
- Wrap Around Services
- Zoning
- Building Codes
- Project Concept

Introduction

Over the past few years, changes in economic and social conditions have created a crisis for our city, province, nation and even globally, that has resulted in previously unseen numbers of individuals leaving traditional housing situations and living in what is generally considered unsatisfactory living conditions, primarily in tent encampments and shelters. Steps must be taken to correct this situation and the development of a tiny homes community in the Saint John region is an important initiative that will most certainly contribute to addressing this problem.

The question is whether the proposed location for the Sunnyside tiny homes community is best for the long-term interests of the community, not the merits of establishing such a project in Saint John.

The proposed site is clearly not a suitable location for this type of development. Establishing a permanent tiny homes community in a remote "out of sight-out of mind" location, that is neither part of an integrated mixed income neighborhood, nor near wrap around support services that are essential to transition high risk individuals back into society, will present a challenge to the success of this approach to help deal with homelessness in our community.

In contrast, the 12 Neighbours community in Fredericton is in a highly visible location directly adjacent to 3 city streets. Additionally, this development includes a large café operation that encourages the public to visit the tiny homes site on a regular basis.

This view is supported by University of Ottawa based recognized expert, Dr Tim Aubry, whose report forms part of this submission. The City has a number of possible locations better suited to this development that would not be segregated from residential areas.

Municipal Plan

The amendments being proposed to the City's Municipal Plan, and required zoning changes that will follow, appear to be totally incongruent with the overall intentions laid out in the current Municipal Plan and in conflict with the various policies on which the Municipal Plan is based.

The current designation of the proposed site under the Municipal Plan is "Park and Natural Areas". The Municipal Plan definition of Park and Natural Areas highlights that ***"Lands in the City designated Park and Natural Areas are generally not appropriate for any form of development..."***

The supporting Policy LU-113 states ***"Council intends that the Park and Natural Areas designation will permit a range of conservation and appropriate recreational land uses*** permitted in the City's major regional and community parks, environmentally sensitive or significant areas, lands that are located adjacent to watercourses, lands adjacent to the City's coastlines, estuarine areas, significant archaeological and geological sites, historic sites, designated heritage places ***and cemeteries."***

Two major community cemeteries are located directly adjacent to the proposed Sunnyside tiny homes community. They are the Fernhill Cemetery and the Shaarei Zedek Cemetery.

- Fernhill Cemetery is the resting place for the 40,000 plus citizens buried within its 200-acre grounds.
- The Shaarei Zedek Cemetery is the oldest Jewish cemetery east of Montreal and was established in 1880. The cemetery is the resting place for one thousand persons and has been the cemetery of the Saint John Jewish community through the years.

Furthermore, the proposed amendment to the Municipal Plan is intended to designate the Sunnyside tiny homes community as Stable Residential conflicts with the current Municipal Plan definition of this designation - "These lands include a number of **existing neighbourhoods** in the city **which are generally built-out and are not anticipated to receive major change over the planning period."** These lands are not even contiguous with an existing stable residential area as they are in fact primarily surrounded by business, commercial and cemetery uses.

Community Issues

There are also a great many community impact issues that need to be taken into consideration when the City considers changes to the existing Municipal Plan and policies to provide for the construction of the Sunnyside tiny homes community.

- **Security** – The proposed location presents serious security concerns with its “out of sight – out of mind” location. The 12 Neighbors Community in Fredericton, on which the proposed Sunnyside project is modeled, is in a location with much more open space and easy visibility from public streets. Despite this, as reported by the Fredericton Police Force’s Integrated Community Services Officer, it is still an attraction to nearby tent encampments that are creating very serious concerns to the police and neighboring residences and businesses. Security concerns with the proposed Sunnyside location include:
 - The employee parking lot for the TD Insurance Service Center, that is directly abutting the proposed location, and services over 700 employees, mostly female, and working night as well as day shifts.
 - The many isolated wooded areas next to the proposed site that are attractive to the establishment of tent encampments and largely invisible from public view, including police patrols.
 - Two community cemeteries immediately adjacent to the proposed site that are similarly attractive to tent dwellers.
 - The retail stores of East Point Shopping, including both grocery and liquor outlets, that are less than 500 feet from the proposed site and easily accessible via existing roadways and paths.

It is recommended that the City, if it has not already done so, reach out to, Fredericton Police Force Integrated Community Services (Cpl. Ryan Kelly @ 506-471-0491 / ryan.kelly@fredericton.ca) to learn from their experiences in dealing with the area of the 12 Neighbours community.

- **Lack of a Mixed Income Environment** - The tiny homes concept is directed towards assisting individuals who for whatever reason find it difficult to afford or to adjust to living in more conventional housing. These individuals need not only a safe and secure home but a range of wrap around services to help them deal with a variety of personal issues including mental health and drug addictions. It is now a generally accepted principle that concentrating this type of housing in one isolated neighborhood is counter

productive to both the individuals and the community. Creation of mixed income residential areas provides a more positive environment for those people facing financial and social challenges, rather than segregating them from society in an out of the way location.

- **Wrap Around Services** – The success of a tiny home community is closely tied to the availability of and access to the various community services required to support residents. What plans, commitments and funding are in place to ensure that these critical support services will be available for the long term to community residents and are these services within walking distance of this location?
- **Zoning** – The City’s justification for proposing this Municipal Plan amendment is “to develop an affordable mini-home park”. The City’s current by-law defines Zone Standards for a mini-home as:

Minimum Lot Area: Interior Lot – 378 square metres (4,069 sq. ft.)

Minimum Ground Floor Area – 55 square metres (592 sq. ft.)

Will the proposed tiny homes and their individual lot sizes comply within this Zone Standards criteria?

- **Building Codes, including Fire Code Regulations** – Can, and will, the tiny homes be constructed in compliance with existing codes and regulations?
- **Project Concept & Management** – While the Sunnyside project is being modelled after the similar 12 Neighbors community in Fredericton, it will not be a duplicate project. The Fredericton community was developed by a private sector entrepreneur who takes a personal and hands on interest in managing the project, while the Saint John proposal will be developed and operated by a community NGO with little or no experience in managing what is essentially a rental property.

Conclusion

Moving ahead with a tiny home community in the City of Saint John is a decision that deserves to be considered very carefully. This is not a short-term band aid to help alleviate a serious social concern currently facing our community. Rather it is a policy decision on the establishment of a new housing category that will be with our community for many years to come, including whatever serious consequences may evolve.

Our research of this issue included reaching out to a respected authority, professor, and researcher Tim Aubry. Doctor Aubry, Ph.D., C. Psych., CE, is an Emeritus Professor in the School of Psychology and Senior Researcher at the Centre for Research on Educational and Community Services at the University of Ottawa. His areas of research include community mental health services, homelessness, and Housing First. Dr. Aubry has collaborated on research projects with community organizations and government, contributing to the development of social and health programs and policies. He was a Member of the National Research Team and the Co-Lead of the Moncton site in the At Home / Chez Soi Demonstration Project.

A copy of Dr. Aubry's comments is attached to this submission and his observations and concerns include:

- The risk of segregation and stigmatization of grouping individuals away from other community residents
- Tiny home villages in other jurisdictions have experienced problems that includes opposition from neighbours, physical conflict between residents, fires, and criminal activity
- Lack of research on the effectiveness of Tiny Home villages at ending homelessness for individuals, it appears to be an experimental strategy rather than an evidence-based approach.
- The Moncton Pathways model of Housing First has extensive research demonstrating its effectiveness at ending homelessness among individuals with mental illness and addiction.

Dr. Aubry concluded his report by stating:

- *“The current lack of evidence of the effectiveness of tiny homes in ending homelessness combined with the negative consequences associated with the approach suggest that there is significant risk in developing Sunnyside Village as a solution to increasing chronic homelessness in Saint John. Instead, the delivery of Housing First services to Saint John residents experiencing chronic homelessness, that includes supporting them in scattered-site private market and social housing throughout the city would be a much better option from the standpoint of ensuring effectiveness at ending their homelessness, becoming integrated into the community, and facilitating recovery.”*

Respectfully submitted,

Canadian Tire, Westmorland Road

DKB Enterprises Inc.
(TD Insurance Customer Service Center)

East Point Inc.
(East Point Shopping)

Leon's Furniture

Tidan Hospitality and Real Estate Group
(Parkway Mall)

November 23, 2024

Attention: City of Saint-John Common Council

To whom it may concern:

My name is Tim Aubry and I am a Emeritus Professor of Psychology at the University of Ottawa whose areas of research over a 32 year career included community mental health services, homelessness, and Housing First <https://uniweb.uottawa.ca/network/profile/members/1026>. I was the Co-lead Researcher for the Moncton site of the At Home / Chez Soi Demonstration Project, a pan-Canadian five-city trial of Housing First. I am also currently the Co-chair of the Canadian Housing First Network - Community of Interest <https://canadianhousingfirst.ca/> .

I am writing you, at the request of a group of Saint-John businesses, to provide commentary on the proposed Sunnyside Tiny Home Community that is planned to house 75 individuals who are homeless.

Many Tiny Home villages for people who are homeless have been built in the Western U.S.A., particularly in California¹. They are often defined as transitional housing that provides shelter and services to individuals who are homeless. Some Tiny Home villages are considered a form of permanent housing. This appears to be the case for the Sunnyside Tiny Home Community that is modeled after the 12 Neighbours Tiny Home Community in Fredericton.

Comments on Tiny Home Villages as a Means of Ending Chronic Homelessness

As a researcher who focuses on evidence-based strategies to end homelessness, I wish to bring attention to the following noteworthy problems associated with the creation of Tiny Home communities for people leaving homelessness:

- (1) Based on research on housing preferences of people who are homeless, most individuals experiencing homelessness, if given some choice, would not likely choose to live in a Tiny Home village. About 85% of individuals who are homeless report a preference for living independently in regular housing such as an apartment in the community rather than living in a group setting with other individuals coming out of homelessness such as found in a Tiny Home village².
- (2) **An inevitable negative consequence of grouping individuals coming out of homeless in a Tiny Home village is their segregation and stigmatization from other community residents³.** The social contact that Tiny Home residents tend to be with other Tiny Home residents. Many individuals express a preference leaving their “street network” while homeless once they are housed. Tiny Home villages are often located on the outskirts of cities contributing to this segregation and making it difficult to access services located in city centres.
- (3) Tiny Homes provide limited living space, presenting a significant challenge for storing belongings. People who experience homelessness and precarious housing have had a history of losing belongings because of a lack of storage space afforded them in shelters, SROs, and rooming

¹ Evans, K. (2020). Tackling homelessness with tiny houses: An inventory of tiny house villages in the United States. *The Professional Geographer*, 72:3, 360-370,

² Richter, D. & Hoffman, H. (2017). Preference for independent housing of persons with mental disorders: Systematic review and meta-analysis. *Administration and Policy in Mental Health*, 44 (6), 817-823.

³ Nelson, G., & Aubry, T. (July 25, 2020). Opinion: Tiny homes not solution to ending homelessness. *Waterloo Region Record*.

houses⁴. Living in a Tiny Home risks contributing to this ongoing history of losing belongings for this population.

- (4) There is no mention of the construction of a Tiny Home village as being part of the Saint-John Homelessness Strategy for 2024-2027⁵. The strategy does identify the creation of transitional housing, public housing, and supportive housing.
- (5) Tiny Home villages are not scalable relative to the size of the homeless population in many cities. The Sunnyside Village will house 75 people. Recent data on homelessness in Saint-John indicates that there are 663 people who experienced homelessness in 2023 with 344 of these individuals chronically homeless⁵. Moreover, the population of individuals who are chronically homeless has doubled from 2022 to 2023.
- (6) Despite their increasing popularity as a response to homelessness, there is no research on the effectiveness of Tiny Home villages at ending homelessness for individuals. At this point in its development, it appears to be an experimental strategy for rather than an evidence-based approach. The USC Annenberg Centre for Health Journalism conducted an analysis of Tiny Home communities located in California⁶. They reported on data available from two counties in California showing a very low success rate at becoming permanently housed for Tiny Home residents (43% in Santa Clara County & 27% in Alameda County).
- (7) Tiny Home villages in California have experienced problems that includes opposition from neighbours, physical conflict between residents, fires, and a murder⁶.
- (8) The cost of housing individuals in Tiny Homes is expensive when combining capital costs, health care, social services, and security. For example, in Kitchener-Waterloo, it is estimated that the operational cost of a Tiny Cabins' village serving as a hybrid shelter separate from its capital costs is \$2.6 million per year for 50 people or \$52K per person per year⁷.
- (9) There is also a lack of research on its implementation and there are no standards or model for a Tiny Home village created for people leaving homelessness¹. Related, the support provided to Tiny Home residents is variable and appears often to be insufficient to help them effectively.

Housing First as an Evidence-Based Model to End Chronic Homelessness

Description of Housing First

In contrast to a Tiny Homes approach to addressing homelessness, the Pathways model of Housing First has extensive research demonstrating its effectiveness at ending homelessness among individuals with mental illness and addiction⁸. The model was tested in Moncton as part of the At Home / Chez Soi

⁴ Bromley, N, Flynn, A., Sylvestre, M.-E., Olson, N. (2023). Law, urban space, and precarious property: The governance of poor people's possessions. *The Fordham Urban Law Journal*, Vol. 1, No. 2, 224-242.

⁵ City of Saint-John (2023). Housing for All: Saint-John Homelessness Strategy (2024-2027). *Authors, Saint-John, New Brunswick*.

⁶ Kendall, M. (2022). Do tiny homes really work as a solution to homelessness? Here's what the data shows. *USC Annenberg Center for Health Journalism*.

⁷ (2024). Truong, F. (2024). Erb's road hybrid emergency shelter evaluation and recommendations. CSD-HOU-24-016. *Authors, Region of Waterloo Community Services Housing Services*.

⁸ Aubry, T., Bloch, G., Brcic, V., Saad, A., Magwood, O., Abdalla, T, Alkhateeb, Q., Xie, E., Mathew, C., Hannigan, T., Costello, C., Thavaom, K., Stergiopoulos, V., Tugwell, P., & Pottie, K. (2020). Effectiveness of permanent supportive housing and income assistance interventions for homeless individuals in high-income countries: A systematic review. *The Lancet Public Health*. 5, e342-360.

Demonstration Project (2008-2013)⁹. It includes the provision of rent subsidies combined with intensive support such as Assertive Community Treatment or Intensive Case Management.

Housing First is guided by three principles that differentiate it from living in a Tiny Home village¹⁰: (1) The provision of rent subsidies gives individuals some choice in accessing housing. Choice of health care and social services is also facilitated in Housing First programs. (2) The second principle guiding Housing First programs is supporting participants' recovery. Services in Housing First programs adopt a recovery focus to help individuals pursue goals, personal growth, and life satisfaction while managing their mental illness. **(3) The third principle entails fostering community integration. Housing First programs separate housing from support such that individuals live independently in the community in scattered-site apartments that are either private market rentals or social housing.**

Housing First has a set of standards that can be replicated to ensure that the program is effective¹¹. A measure of fidelity to these standards has been developed, enabling the assessment of programs for the presence of critical ingredients of Housing First. Research has demonstrated that greater fidelity to Housing First standards is associated with positive outcomes such as housing stability, better community functioning, and improved quality of life¹².

Research on Housing First

Housing First has been tested in rigorous research and compared to usual services in Canada, the United States and France. In all three countries, Housing First proved to be far superior in ending homelessness compared to traditional services in the community⁸.

The Canadian At Home / Chez Soi study examined Housing First programs in five Canadian cities (Vancouver, Winnipeg, Toronto, Montreal, and Moncton) with over 2,000 participants with a history of homelessness and severe mental health problems, often including addictions⁹. Individuals receiving Housing First spent over two times the amount of time stably housed (73%) compared to those receiving usual services in the community. A six-year follow-up of the Toronto site group over a six-year period showed these housing stability outcomes being sustained¹³.

⁹ Goering, P., Veldhuizen, S., Watson, A., Adair, C., Kopp, B., Latimer, E., Nelson, G., Macnaughton, E., Streiner, D., Aubry, T. (2014). National At Home/Chez Soi final report. Calgary, AB: *Mental Health Commission of Canada*.

¹⁰ Aubry, T., Nelson, G., & Tsemberis, S. (2015). Pathways Housing First for people with severe mental illness who are homeless: A review of the research. *Canadian Journal of Psychiatry*, 60, 467-474.

¹¹ Aubry, T., Bernad, R., & Greenwood, R. (2018). A multi-country study of the fidelity of Housing First programmes. *European Journal of Homelessness*, 12 (3), 15-29.

¹² Goering, P., Veldhuizen, S., Nelson, G., Stefanic, A., Tsemberis, S., Adair, E., Distasio, J., **Aubry, T.**, Stergiopoulos, V., & Streiner, D. (2016). Further validation of the Pathways Housing First Fidelity Scale, *Psychiatric Services*, 67(1), 111-114.

¹³ Stergiopoulos, V., Mejia-Lancheros, C., Nisenbaum, R., Wang, R., Lachaud, J., O'Campo, P., & Hwang, S.W. (2019). Long-term effects of rent supplements and mental health support services on housing and health outcomes of homeless adults with mental illness: Extension study of the At Home/Chez Soi randomised controlled trial. *The Lancet*, 6, 915-925.

Findings from the Moncton Site of the At Home / Chez Soi Demonstration Project

Housing First delivered in Moncton produced the best outcomes of the five cities in the At Home / Chez Soi Project¹⁴. Notably, compared to individuals receiving treatment as usual, Housing First participants ended their homelessness more quickly (i.e., 23 vs. 88 days), spent a greater proportion of time stably housed (i.e., 88% vs. 30%) and rated the quality of their housing more positively. Housing First participants also reported greater gains in quality of life, community integration, and perceived recovery than treatment as usual participants. The cost for the Housing First program in Moncton, including rent supplements and support services through an Assertive Community Treatment team was estimated at \$21,065.33 per person per year (2024 CAD)¹⁵.

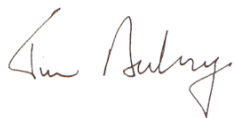
Conclusion

The current lack of evidence of the effectiveness of Tiny Homes in ending homelessness combined with the negative consequences associated with the approach suggest that there is significant risk in developing Sunnyside Village as a solution to increasing chronic homelessness in Saint-John.

Instead, the delivery of Housing First services, that includes **supporting people who are chronically homeless to move into scattered-site private market and social housing throughout the city, would be a much better option from the standpoint of ensuring effectiveness at ending their homelessness, becoming integrated into the community, and facilitating recovery.**

It is my understanding that Saint-John already has a Housing First program (H.O.P.E.) Team program that has demonstrated effectiveness at ending homelessness since it was launched in October 2022¹⁶. It would simply require the scaling up of this program to meet the demand in the city

Sincerely,



Tim Aubry, Ph.D., C.Psych.
Emeritus Professor, School of Psychology
University of Ottawa
Co-chair, Canadian Housing First Network – Community of Interest

¹⁴ Aubry, T., Bourque, J., Goering, P., Crouse, S., Veldhuizen, S., LeBlanc, Cherner, R., Bourque, P-É, Pakzad, S., & Bradshaw, C. (2019). A randomized controlled trial of the effectiveness of Housing First in a small Canadian city. *BMC Public Health*, 19 (1), 1-14.

¹⁵ Latimer E.A., Rabouin D., Cao Z., Ly A., Powell G., Aubry T., Distasio J., Hwang S.W., Somers J.M., Bayoumi, A.M., Mitton C., Moodie, E.E.M., Goering, P.N. (2020) Cost-effectiveness of Housing First with Assertive Community Treatment: Results from the Canadian At Home/Chez Soi trial. *Psychiatric Services*, 71(10), 1020-1030.

¹⁶ Sweet, J. (2024) Housing support team 'hope' -ful about tackling homelessness in Saint-John. Saint-John: CBC New (Feb. 3, 2024).