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Item No. 5.1.1

Halifax Regional Council

November 24, 2020

TO: Mayor Savage and Members of Halifax Regional Council

SUBMITTED BY: Original Signed by

Jacques Dubé, Chief Administrative Officer

DATE: November 20, 2020

SUBJECT: Rapid Housing Initiative Agreement – Investment Plan

ORIGIN

On October 27, 2020 the Federal Government launched a new Rapid Housing Initiative (RHI) that invests \$1 billion to create up to 3,000 new permanent, affordable housing units across Canada. The RHI allocates \$8,659,527 to HRM through the Municipal Funding Stream.

On November 17, 2020 Regional Council passed the following motion:

"THAT Halifax Regional Council direct the Chief Administrative Officer to enter into the Rapid Housing Initiative Agreement with Canada Mortgage and Housing Corporation ("CMHC"), as provided in Attachment A of the staff report dated November 11, 2020, to accept \$8,659,527 for the creation of a minimum of 28 affordable housing units."

LEGISLATIVE AUTHORITY

Halifax Regional Municipality Charter (HRM Charter), Part III - Powers

- 73(b) The Municipality may enter into and carry out agreements with
 - (i) the Minister of Community Services or Canada Mortgage and Housing Corporation with respect to housing projects, or
 - (ii) any body corporate or agency having similar objects to Canada Mortgage and Housing Corporation with respect to projects pursuant to the National Housing Act (Canada);

RECOMMENDATION

It is recommended that Halifax Regional Council:

 Direct the Chief Administrative Officer to include an Investment Plan providing funding for the proposed affordable housing developments by the Mi'kmaq Friendship Centre, Adsum Women and Children and the North End Community Health Association, as further discussed in this report, into the Rapid Housing Initiative Agreement with Canada Mortgage and Housing Corporation ("CMHC");

RECOMMENDATIONS CONT'D ON PAGE 2

- Direct the Chief Administrative Officer to accept a request for site-specific amendments for 5823
 College Street to consider amendments to the applicable secondary municipal planning
 strategies, including the Regional Municipal Planning Strategy (RMPS) and land-use by-laws
 (LUB), to allow the development of an emergency shelter, shared housing use and multiple unit
 residential building at 5823 College Street; and
- Authorize the CAO to negotiate and execute Contribution Agreements, and any amendments or consents arising from them, with recipients, to distribute CMHC Rapid Housing Initiative funding for approved projects.

BACKGROUND

On November 17, 2020, Regional Council directed the Chief Administrative Officer to enter into the Rapid Housing Initiative (RHI) Agreement with Canada Mortgage and Housing Corporation (CMHC), to accept \$8,659,527 for the creation of a minimum of 28 affordable housing units. Please see report and the corresponding agreement here:

https://www.halifax.ca/sites/default/files/documents/city-hall/regional-council/201117rc1118.pdf

As a requirement of the RHI Agreement, HRM must provide an investment plan outlining the specific projects that will be funded through \$8,659,527 and how they will comply with the set requirements of the RHI.

When the RHI was originally announced in late October, HRM staff reached out directly to approximately 40 non-profit housing providers, numerous housing advocates and launched a website seeking expressions of interest. Staff originally received 16 submissions, although 4 withdrew their submissions as the requirements of the RHI were better understood.

Conditions of RHI Funding

To be eligible for funding, costs must be associated with:

- Construction of modular housing including acquisition of land;
- Conversion of a non-residential building to a residential building including acquisition of land; or
- Renovation of existing housing that is currently uninhabitable, including acquisition of land.

Projects funded under the RHI must:

- be constructed within 12 months of the investment plan being agreed to:
- operate for a minimum of 20 years;
- if the units are modular housing, exceed provincial building code accessibility and energy efficiency requirements by five percent; and
- serve and be affordable (household is paying less than 30 per cent of gross income on housing costs) to targeted people and populations who are vulnerable and:
 - who are also, or otherwise would be, in severe housing need (households that pays 50% or more for their current accommodations), or
 - people at high risk of homelessness (an individual, family or community without stable, safe, permanent, appropriate housing, or the immediate prospect, means and ability of acquiring it).

The Municipality is further encouraged to prioritize projects targeted to women (30%) and Urban Indigenous peoples (15%) and projects that will create a positive impact to employment within the community.

On June 25, 2019 Regional Council directed the Chief Administrative Officer to not accept requests for site-specific amendments to the Secondary Municipal Planning Strategies (SMPS) in Centre Plan Package B areas while the planning process to adopt Package B is underway. Normally Council would need to pass a motion of rescission by a two-third vote to countermand this 2019 motion and initiate the amendment process for 5823 College Street. Since the municipal election occurred on October 17, 2020, Administrative

Order One no longer requires a motion of rescission and Council may initiate the amendments by a majority vote.

DISCUSSION

Due to the short time line to allocate funding non-profit housing, organizations were given very little time to prepare submissions and even a shorter amount of time to provide follow up information. HRM greatly appreciates the time and effort that went into preparing these submissions and acknowledge this work was on top of daily responsibilities and already busy schedules. HRM would like to continue to work with the non-profit housing organizations to bring more of these projects to fruition.

Submissions were prioritized on the basis of target populations being served, where preliminary plans had already been developed, the applicant owned the property, and the current zoning permitted the use. The cost per unit and an operating budget that could provide affordability to the target population for 20 years were also strong considerations.

A summary of all 12 submissions is provided in Attachment A.

Investment Plan

Based on the review of submissions, staff recommend the following three projects be considered in the investment plan. The requested funding from the three submissions would total \$8,083,213 for 52 units (32.7% targeted at Urban Indigenous people, and 48% are targeted at women.) This would leave approximately \$576,314 remaining for contingency purposes.

1. Mi'kmaq Native Friendship Centre (MNFC) – 5823 College Street, Halifax

Requested Funding: \$2,878,400 for 17 units/rooms (\$169,317.65/unit/room)

The MNFC is proposing the redevelopment of 5823 College Street to develop a 30-bed shelter, 10 room shared housing use and 7 one to two bedroom units. Pursuant to the requirements of the RHI funding, the development would be in the form of modular construction and it is anticipated that the development can be occupied by December 2021. Housing would serve an urban indigenous population and would offer services to help residents' transition to permanent housing. The MNFC already has 2/3 of the required funding for this development through a combination of funding from other levels of government and their own funds.

Considerations-Amendment to the Regional Plan

The main consideration of this proposed development is the zoning. The property is currently zoned R-2 under the Halifax Peninsula Land Use By-law. This zone permits a maximum of 4 units. However, the property is located in an urban area of peninsula Halifax and abuts a property with a Centre-2 Zoning under the Regional Centre Land Use By-law. The Centre-2 Zone is a high-density residential zone and would allow for the proposed uses. As such, staff are proposing that Council initiate an amendment to the applicable planning documents, which may include the Regional MPS to allow for land use policy to allow the proposed development.

An amendment to any municipal planning strategy, especially the RMPS is not regular practice and only considered in unique circumstances for a project of strategic importance to the municipality. While the proposed amendment to the land use planning documents is specific in relation to the site, the development has significant regional impacts as it will provide deeply affordable housing available to indigenous residents throughout HRM. As the opportunity to access RHI funding is an extremely unique circumstance to meet Council's strategic priority to support affordable housing and the use is consistent with uses permitted in the area, staff recommend initiating an amendment to the RMPS and applicable land use by-law.

2. Adsum Women and Children- 158 Greenhead Road, Lakeside

Requested Funding: \$3,977,188 for 25 units (\$159,087.52/unit)

Adsum Association for Women and Children, is proposing to expand their existing women's shelter to provide 25 residential units for women and women with children. Consistent with Adsum's mandate and mission, this housing would serve women, families and trans persons at-risk of homelessness. Adsum has already developed preliminary plans and is proposing a passive solar panelized design that will not only reduce operating costs but will ensure energy efficiency that is well above building code.

Development Agreement Process

Adsum has been working on this development project since early 2019 and is in the final stages of a discretionary approval process with HRM. It is anticipated that staff will be bringing the proposed development agreement to Halifax and West Community Council in December 2020 and a public hearing will be held in January 2021.

Notwithstanding the above, we are confident that the development can be occupied within one year.

3. North End Community Health Association (NECHA) - 2218 Maitland Street, Halifax

Requested Funding: \$1,227,625 for 10 rooms (\$122,762.50/room)

The NECHA is proposing the renovation of a vacant 4 unit building to convert into a 10 to 11 bedroom shared housing building where units will be targeted towards African Nova Scotians who experience chronic homelessness. There are currently 15 individuals who identify as a person of African descent on the By Name List, a list identifying individuals who are in most need of supportive housing. This project will follow the Housing First model and housing support workers will be provided to residents.

As the project is a renovation of an existing building the timeline for completion should be less than new construction. The NECHA was one of the only proposals that aims to have the development complete within 6 months.

Property Ownership

Ownership is the primary risk to proceeding with this development, however the property owner has expressed interest in selling 2218 Maitland Street to NECHA and they are the sole party in discussion on the purchase of the property as it is not on the open real estate market.

Municipal Tax Relief

A significant component of ongoing operational costs for these housing projects are property taxes. It is recommended that the proponents should apply for consideration of 100% tax relief (Fully Tax Exempt) through Administrative Order 2014-001-ADM. This will help both HRM and the proponents to manage the project costs over time. The deadline for new applications is November 30, 2020. Both the Mi'kmaq Friendship Centre and Adsum House currently receive some level of tax relief from the Municipality. Should HRM choose any projects for the Rapid Housing Initiative Project stream, it is also recommended that these projects pursue a full tax exemption.

Project Stream Funding

While this report focuses on allocating funds through the Municipal Stream, the RHI also has a Project Stream component, which will prioritize applications received from Provinces, Territories, Municipalities, Indigenous governing bodies or organizations and non-profits based on the overall strength of the application. The Municipality will work with organizations that were not considered within the Municipal Stream to support applications to CMHC for this funding stream. The Municipality does have the opportunity to request additional funding from CMHC through the Project Stream, however these projects will compete with projects nationally.

Next Steps

Once Council endorses the projects to be included in the investment plan, it will be submitted to CMHC for review. It is anticipated CMHC will advise HRM within 7 to 14 days if the projects satisfy the requirements and meet the terms of the funding arrangement.

FINANCIAL IMPLICATIONS

Beyond the risks outlined in the CAO's report presented to Council on November 17, 2020, not only will HRM be responsible for the \$8,659,527 should projects fail to meet the deadline for completion, but HRM will also need to ensure units are targeted to those who are homeless or at risk of homelessness and that rents are not more than 30 percent of their income.

To understand potential risks of ensuring affordability, HRM staff worked with representatives from CMHC and the Department of Municipal Affairs and Housing to understand the potential impact on project operating budgets. While it is not expected that all units of all projects will be housed by recipients of the provincial income assistance program, total income was based on the provincial household rates. Based on the recommended projects and considering the variables in the provided operating budgets, it is calculated that the potential deficit over 20 years ranges from \$500,000 to \$3,000,000 (approximately \$25,000 to \$150,000 annually). It is important to note the deficit range is based on an extreme worst-case scenario. Projects are expected to be self-sufficient and it is unlikely the noted deficit will ever reach either amount. Should a deficit occur, it could potentially be a pressure on HRM in future operating budgets. HRM will attempt to mitigate this risk by the structure of the contracts with third party providers.

RISK CONSIDERATION

Beyond the risks discussed in the report presented to Council on November 17, 2020, the main risk consideration of this report is the financial implications as discussed above. There are also risks related to construction that are beyond the Municipality's control as each is an external construction project under the control of a third party.

Further, it is worth noting that two of the developments are subject to a discretionary approval process and may not be able to proceed should Council not agree the proposals comply with applicable planning policy or are appropriate, in the case of a secondary plan amendment. Staff advise that all of the proposed developments are appropriate and comply with overall planning policy, however it is important to state that by approving the proposed developments to be included in the RHI investment plan, it does not obligate Council to provide the required discretionary planning approvals.

COMMUNITY ENGAGEMENT

Investment Plan

Direct discussions and consultation were held with non-profits who responded to the October 30, 2020 call for expressions of interest.

Amendment to Municipal Planning Strategy

To consider the development at 5823 College Street, planning staff have proposed initiating an amendment to the Regional Plan.

Should Regional Council choose to initiate the RMPS, SMPS and LUB amendment process related to the development of 5823 College Street, the *HRM Charter* requires that Regional Council approve a public participation program. In February of 1997, Regional Council approved a public participation resolution, which provides broad discretion on the consultation process required for MPS amendments that are regional in nature. The 1997 policy provides that, for amendments that are regional in nature, staff would

recommend an appropriate public participation program. Accordingly, staff will recommend a public participation program at a later meeting of Regional Council.

In addition to this public participation, the *HRM Charter* requires a public hearing to be held before Regional Council, which can consider approval of any amendments. Amendments to the RMPS, SMPSs and LUBs will potentially impact the following stakeholders: provincial government, the property owner (Mi'kmaq Friendship Centre) and the general public.

ENVIRONMENTAL IMPLICATIONS

The RHI funding requires new developments to exceed the energy requirements of the building code by 5%. Two of the proposed projects will involve new development.

ALTERNATIVES

- Regional Council may direct the CAO to select alternative projects to be included in the Investment Plan to be submitted to CMHC. Doing this could increase the potential financial risk to the Municipality and may result in not meeting the Rapid Housing Initiative's submission deadline to receive funding. A supplementary report, an additional meeting of Regional Council and direction of Council will be required prior to November 27, 2020.
- 2. Regional Council may direct the CAO to include a Municipal application to the Rapid Housing Initiative Project Stream to request funding for some or all of the projects not included in the Investment Plan. Doing this could increase the potential financial risk to the Municipality and may result in not meeting the Rapid Housing Initiative's submission deadline to receive funding. A supplementary report, an additional meeting of Regional Council and direction of Council will be required prior to November 27, 2020.
- 3. Regional Council may direct the CAO to not submit an investment plan and return the funding of \$8,659,527 to CMHC.
- Regional Council may initiate a plan amendment process for some or all of the development projects included in Attachment A. This may include an additional CAO report and meeting of Regional Council.

ATTACHMENTS

Attachment A: Non-Profit Housing Development Projects

A copy of this report can be obtained online at halifax.ca or by contacting the Office of the Municipal Clerk at 902.490.4210.

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Attachment A: Non-Profit Housing Development Projects

PROJECT/NON- PROFIT	PROJECT DESCRIPTION	REQUEST	CONSIDERATIONS	COMMENTS
ADSUM WOMEN AND CHILDREN- 158 GREENHEAD RD LAKESIDE	Expansion of existing women's shelter to provide 25 residential units for women and women with children. Adsum is proposing a passive solar design building that will greatly increase energy efficiency. Background of Organization Adsum has decades of experience developing and managing affordable housing in HRM. They own several properties though out HRM ranging from shelters, transitionary housing to permanent housing. Housing and programming is targeted to women and women with children	\$3,977,188 (\$159,087.52/unit)	Owns Land: Y Zoning: N Developed Plans: Y Conversion: n/a Target Population: Women and Women with Children	While the current zoning does not permit the proposed use, the applicant has been working with HRM over the past several months to enter development agreement. A staff report is expected to be presented to Halifax and West Community Council in December with a potential public hearing in January. Beyond the concerns of rezoning a property, staff are confident that the project will conform with the required timelines and that the development can be occupied within one year.
AFFORDABLE HOUSING ASSOCIATION OF NOVA SCOTIA (AHANS) – TRUE NORTH CRESCENT	New development of 37 townhouse units aimed at families. AHANS is proposing a passive solar design building that will greatly increase energy efficiency. Background of Organization AHANS is as an advocate for affordable housing throughout Nova Scotia. They conduct research, provide education,	\$6,317,565 (\$170,754/unit)	Owns Land: N Zoning: Y Developed Plans: N Conversion: n/a Target Population: Families at Risk of Homelessness.	On November 17, 2020 Regional Council approved the less than market sale of the 4 subject properties at True North Crescent to AHANS. HRM and AHANS are currently in the process of entering into a purchase and sale agreement. One of the properties is subject to an environmental assessment that will need to be completed prior to purchase and

	and consulting services to support the sector's varied service providers. AHANS was a member of the member of the former Creighton-Gerrish Development Association and in recent years have acquired a multiple unit dwelling to retain affordability.			sale (although 3 of the properties could proceed separately). AHANS has a strong proposal and staff hope to support their submission for project stream funding.
AKOMA HOLDINGS INCORPORATED	New development of 4 modular residential units which would be part of a larger master planned community. Background of Organization In 2014, Akoma acquired the assets from the Nova Scotia Home for Coloured Children which includes 310 acres of property and various buildings including child facilities and community centre. Akoma is in the process of developing a master community plan to develop the lands including the reuse of the Old Home for a commercial use.	\$1,287,000 (\$321,750/unit)	Owns Land: Y Zoning: N Developed Plans: Y Conversion: n/a Target Population: African Nova Scotians	Akoma has been working with the Municipality for several years to develop a master plan for their lands. While they are nearing a Council approval date for the first phases of this development is expected for March of this year. Further, due to the rushed timeline for RHI submissions more time would be needed to discuss affordability targets. Staff hope to continue to work with Akoma and support future applications for project funding including a potential application for funding through project stream.
CLOVERDALE COURTWORK SOCIETY (CLOVERDALE) /ELIZABETH FRY SOCIETY OF MAINLAND	Conversion a commercial building to housing for women involved in the criminal justice system. This is especially needed when one must find	\$1,124,000 (\$112,400/unit)	Owns Land: N Zoning: N Developed Plans: n/a Conversion: Y	This development would require a change in land use permissions. development is the zoning. Further, given this property is in an industrial zone and within an

NOVA SCOTIA (EFMNS) – 125 JOSEPH ZATZMAN DRIVE	new accommodation based on bail conditions. Background of Organization Coverdale is a non-profit organization that supports women, girls and trans persons affected by the criminal justice system. EFMNS is a non-profit organization that engages with vulnerable women and girls to foster personal empowerment and address the root causes of criminalization.		Target Population: Women who are involved in the criminal justice system.	industrial designation, more consideration is needed before permitting residential uses. Staff hope to support Cloverdale and EFMNS in future applications for project funding.
DARTMOUTH NON- PROFIT HOUSING SOCIETY (DNPHS) - 232 AND 234 CRICHTON AVE	New development of two single unit dwellings and secondary suites for a total of four units. ½ of the units would be intended for seniors. Background of Organization DNPHS has 38 years experience providing housing in and around Dartmouth. The organization has a diverse housing stock with predominately 3- and 4-bedroom units.	\$1,354,476 (\$338,600/unit)	Owns Land: N Zoning: Y Developed Plans: Y Conversion: n/a Target Population: Families and Seniors at risk of homelessness.	Dartmouth Non-Profit had hoped to access surplus HRM property at 232 and 234 Crichton Ave, however due to the several potential legal issues regarding a right-of-way, there is concern that there is not sufficient time to resolve such issues and still meet RHI deadlines. Staff hope to continue to work with Dartmouth Non-Profit to explore the potential use of this land for housing.
HOMES FOR HEROES – HOUSING FOR VETERANS	New development of 20-24 tiny home community. Homes for Heroes is primarily looking for land and financing to cover soft costs.	\$500,000 (\$20,833.33/unit)	Owns Land: N Zoning: N Developed Plans: N Conversion: n/a	While Regional Council directed staff to consider land use policy for clustered tiny homes as part of the Regional Plan and Land Use By-law Simplification process, it would be

	Background of Organization Homes for Heroes is a group based in Calgary that would like to develop a clustered tiny home village for veterans transitioning back to civilian life. The main contribution they are looking for is Municipal land with some funding for soft costs. Homes for Heroes has completed successful projects in Calgary and is building communities in Edmonton and throughout Ontario.		Target Population: Veterans	difficult to consider this proposal as an expediated amendment due to the nature of the land use. Staff will continue to work with Homes for Heroes to locate potential property for a Homes for Heroes development.
LAKE CITY WORKS— SEVERAL LOCATIONS	New development of 23 tiny homes as backyard suites throughout HRM. Tiny houses would be intended for people dealing with mental health and addiction issues however, all members of target populations would be eligible for support. Lake City Works would be the developer of the tiny homes. Background of Organization Lake City Works is an established nonprofit in Dartmouth, who works to support people living with mental illness, including employment related programming and wrap around services through several social enterprises which support their mandate.	\$4,000,000 (\$173,913.04/unit)	Owns Land: N Zoning: Y Developed Plans: Y Conversion: n/a Target Population: People Dealing with Mental Illness and/or Addiction	While Lake City Works would not retain ownership of the properties, they would serve as landlords to the tiny homes and would provide support services. Lake City Works has informal agreements with several property owners and has potential funding from other levels of government. While Lake City Works may have less experience specifically in mass construction of modular housing, they have established plans and the expertise needed to complete the work. Lake City Works has a strong proposal and staff hope to support their submission for project stream funding.
MI'KMAQ NATIVE FRIENDSHIP CENTRE	New development with 30 bed shelter, 10 room SRO and 7 bachelor units.	\$2,878,400 (\$169,317.65/unit)	Owns Land: Y Zoning: N	While the current zoning does not permit the proposed use, the

(MNFC) – 5823 COLLEGE STREET

Housing would serve urban indigenous population and would offer services to help residents' transition to permanent housing.

Background of Organization

Each year the MNFC runs over 40 programs for more than 7,000 Urban indigenous community members. These range from employment services, to daycare to addictions services. Included in their portfolio of services are several wraparound programs that support the housing needs of the regions Urban Indigenous Community.

NORTH END COMMUNITY HEALTH ASSOCIATION (NECHA) – 2218 MAITLAND STREET

Renovation of vacant 4 unit building to convert into a 10 to 11 bedroom shared housing building that is aimed towards African Nova Scotians who experience chronic homelessness. Project will follow the Housing First model and housing support workers will be provided to residents.

Background of Organization

NECHA was established in response to an absence of primary health care services in Halifax's North End. They are a well-established hub in the North End community and offer primary care, pre-and post-natal care, dental services, nutrition, social work, Mobile Outreach Developed Plans: Y Conversion: n/a Target Population: Urban Indigenous People location and proximity to higher density zone makes a request to amend the zoning reasonable. As such staff propose an expediated discretionary approval process.

This development has funding from other levels of government and preliminary plans were already in development.

Staff are confident that the project will conform with the required timelines and that the development can be occupied within one year.

\$1,227,625 Owns Land: N

(\$122,762.5 / unit) Zoning: Y
Developed Plans: n/a
Conversion: Y
Target Population:
African Nova Scotians
who Experience Chronic

Homelessness.

Since the project is a renovation of an existing building there is less concern with meeting completion within one year.

Beyond, property ownership there are very few barriers with proceeding with this development immediately. Since NECHA is the sole party in discussion on the purchase of 2218 Maitland Street, staff are confident that the project will conform with the required timelines and that the development can be occupied within one year.

	Street Health (MOSH), Housing First outreach, mental health walk-in programs and advocacy.			
ROOTED COMMUNITIES INC	New development of 20-24 tiny home community <u>Background of Organization</u> Rooted Communities would like to develop a tiny home community serving those who are experiencing homelessness or at risk of homelessness including several amenities to support residents. They would like to follow the Coop Community Village Model	\$3,000,000 (\$100,000/unit)	Owns Land: N Zoning: N Developed Plans: N Conversion: n/a Target Population: Those who are Homeless or are At Risk of Being Homeless.	While Regional Council directed staff to consider land use policy for clustered tiny homes as part of the Regional Plan and Land Use By-law Simplification process, it would be difficult to consider this proposal as an expediated amendment due to the nature of the land use. Finding suitable surplus land on such a short time line also proved to be problematic, however we hope to continue to work with Rooted Communities Inc to locate suitable land for the future.
WELCOME HOUSING AND SUPPORT SERVICES - CUNARD ST	New development to construct a new 28 unit residential building for MEN who have experienced or are at risk of experiencing homelessness. Background of Organization Welcome Housing provides housing and support services in Halifax and Dartmouth that allow single men and women to live independently, with access to Tenant Support Workers and a Wellness Coordinator.	\$8,700,000 (\$310,714.29/unit)	Owns Land: Y Zoning: Y Developed Plans: N Conversion: n/a Target Population: Individuals who are at Risk of Being Homeless	Welcome Housing has contacts with an experienced modular builder and staff hope to support their submission for project stream funding. However the required level of detail was not able to be provided to meet the deadline for submissions for the municipal stream.

YWCA – 48 LOVETT LAKE COURT

Development will convert an existing office building to a minimum of 15 residential units - some targeted towards senior women who are former sex workers. YWCA will provide several support services to residents.

To help fund this development YWCA will retain the office space on main floor of the building to establish an innovation hub and rent space to other non-profit groups.

Background of Organization

The YWCA was established in 1874 and has been providing housing and support services for women and children since inception throughout HRM

\$4,396,308 (\$293,087.20/unit)

Zoning: N Developed Plans: n/a Conversion: Y

Owns Land: N

Target Population: Senior Women

development is the zoning.
Further, given this property is in an industrial zone and within an industrial designation, more consideration is needed before permitting residential uses.

This development would require a

change in land use permissions.