



January 19, 2024

To: City of Mississauga – Planning

Attention: Andrea Dear
Planner, Development Central
Telephone: (905) 615-3200 x.8615
Email: andrea.dear@mississauga.ca

Re: Parking Justification – Land Use Memo

Dear Ms. Dear,

Saint Luke's Dixie Senior Residence Corporation (SLDRC), which has been operating the Westminster Court apartments at 4150 Westminster Place since 1982, is a registered not-for-profit corporation whose primary purpose is to provide housing, and is in good standing under the *Not-for-Profit Corporations Act, 2010*. Furthermore, their 190 rental units at 4150 Westminster Place are, and always have been, affordable rental units for Mississauga seniors. As seniors affordable rental units operated by a non-profit housing provider, Westminster Court's land use falls into a crack within City of Mississauga Zoning By-Law 0225-2007.

Zoning By-Law 0225-2007 has several types of uses which partially – but not fully – cover the operations of 4150 Westminster Place. Table 4.15.1 in the By-Law indicates *Apartment* and *Retirement Building* Uses are permitted in Residential Apartment (RA) zones. The rental tenure and multi-unit residential built form of Westminster Court fit the definition of the *Apartment* use. However, it does not capture the demographic composition. The *Apartment* use includes housing for families and adults under the age of 65. This is too broad to accurately describe the land use of Westminster Court, which is exclusively for seniors. Alternatively, the *Retirement Building* use is too specific to apply either. While the *Retirement Building* use is exclusively for seniors, it is defined under Section 1.2 of the By-Law as having common facilities for the preparation and consumption of food, and having on-site medical services provided. Westminster Court does not (and does not intend to) have these facilities or services on-site.

The relevance of this ambiguous land use definition arises with regards to the calculation of an appropriate parking rate. Table 3.1.2.1 of the By-Law, which specifies required off-street parking spaces for residential uses in new development, provides a rate for *dwelling units provided by a non-profit housing provider in a rental apartment* (Line 4.0). However, the required resident spaces per unit (0.65 for Precinct 3) overstates the parking demand for Westminster Court as this land use type does not differentiate based on resident demographics. Working families living in apartments operated by non-profit housing providers have much greater demand for private automobiles and parking spaces than seniors. Whereas working age adults typically require means of transportation for commuting to work on weekdays, seniors typically do not have the same needs.



Alternatively, the land use type *dwelling units provided by a non-profit housing provider in a retirement building* (Line 15.0 of Table 3.1.2.1) is a more accurate description of Westminster Court's demographic. However, without communal dining facilities and on-site medical services, Westminster Court requires fewer staff than this land use. As all dwelling units at 4150 Westminster Place have their own ensuite kitchen and no medical services, no medical or kitchen staff are required, and fewer cleaning or facilities staff. Currently, Westminster Court operates with 1 full-time staff member, and 2 part-time staff.

While Westminster Court's land use types falls somewhere between *dwelling units provided by a non-profit housing provider in a rental apartment*, and *dwelling units provided by a non-profit housing provider in a retirement building*, the similarity in its resident demographic to the latter means that the parking rate requirement for this use (0.35 per unit for Precinct 3) should apply to the site. As resident demographics heavily influence automobile ownership and use (driven by low employment rates for seniors), applying a similar parking space requirement is appropriate.

Looking forward to the redevelopment and intensification of 4150 Westminster Place, SLDR's proposal is to add 70 units of the same use – affordable rental apartments for seniors – to the site. In this way, the parking rate for *dwelling units provided by a non-profit housing provider in a retirement building* should be considered the applicable rate when considering the proposed parking supply and the appropriateness of site-specific zoning to accommodate that use on the site.

Sincerely,

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