

PLANNING JUSTIFICATION REPORT

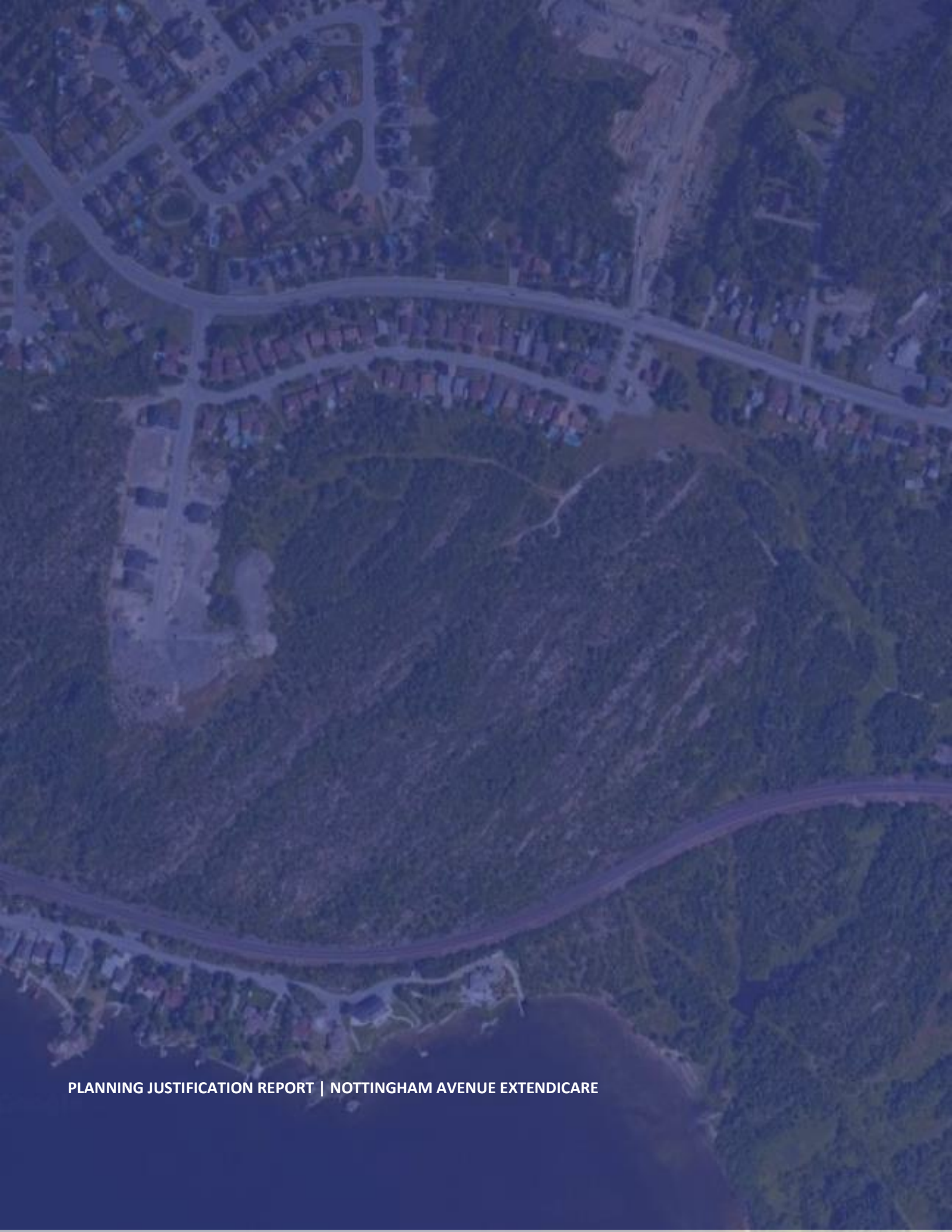
ZONING BY-LAW AMENDMENT

EXTENDICARE NOTTINGHAM

CITY OF GREATER SUDBURY

NOVEMBER 2020

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1.0 INTRODUCTION

TULLOCH Engineering (TULLOCH) has been retained by Extendicare Canada to prepare a planning justification report as part of a complete application to amend the *City of Greater Sudbury Zoning By-Law 2010-100Z*. This report provides a planning analysis and justification for the amendment needed to rezone the subject lands from 'I-49' permitting a 3-storey 192-bed long term care facility to 'Institutional- I(S)' to permit a 5-storey 320-bed long term care facility.

This report reviews consistency of the application in the context of applicable policies and direction found within the following documents and plans:

- *2020 Provincial Policy Statement*
- *Growth Plan for Northern Ontario*
- *City of Greater Sudbury Official Plan*
- *City of Greater Sudbury Age Friendly Community Action Plan (AFC)*
- *City of Greater Sudbury Zoning By-Law 2010-100Z*.

Overall, the author finds that the proposed zoning by-law amendment conform with the City of Greater Official Plan, is consistent with the 2020 Provincial Policy Statement (PPS) and represents good planning.

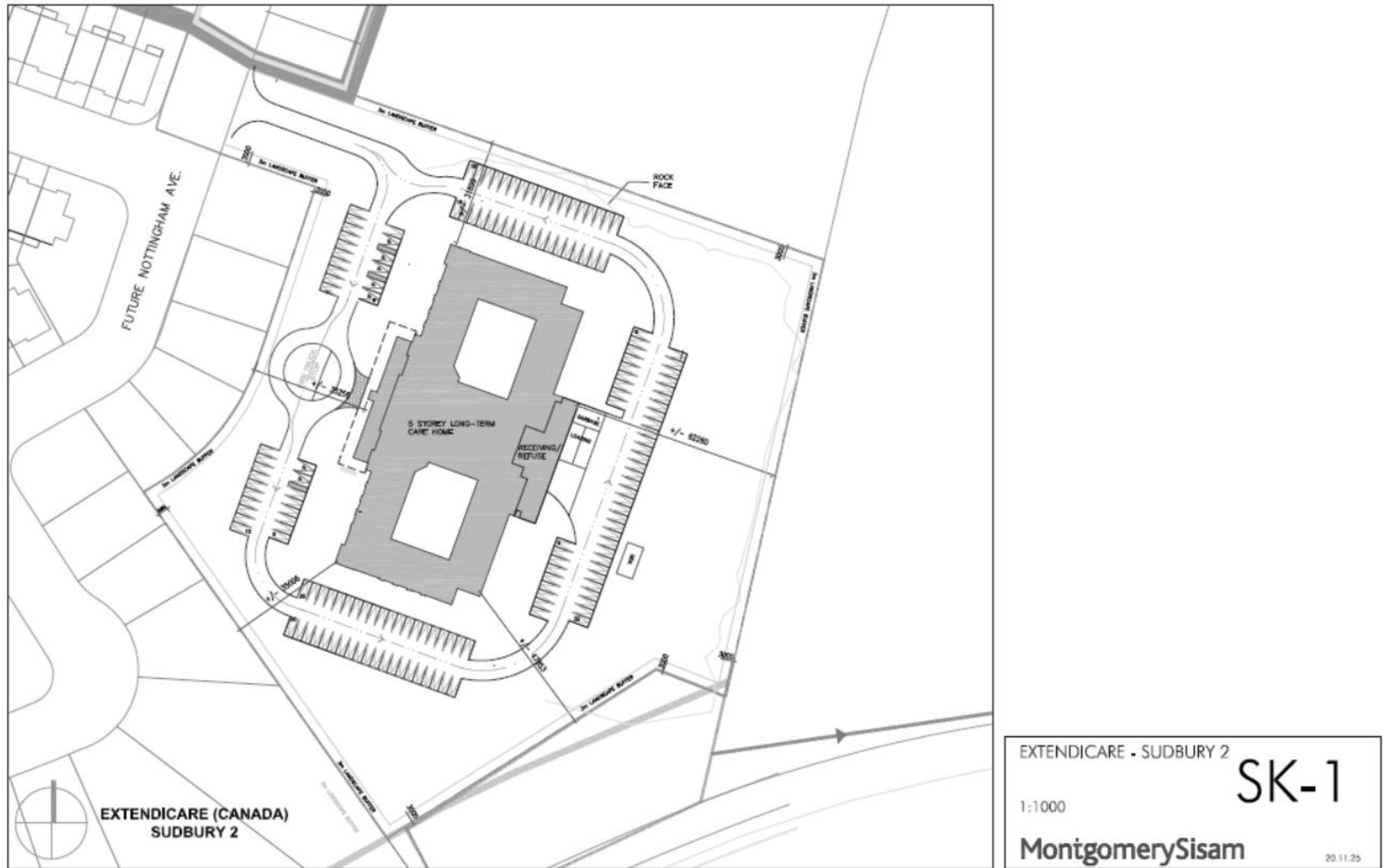
2.0 PROPOSAL

The proposed application for zoning by-law amendment would rezone the subject property from 'Institutional Special-I(49)' permitting a 3-storey 192 bed long-term care facility to 'Institutional Special (I(S))' to permit a 5-storey 320-bed long term care facility. The development proposes to provide 160 parking spaces, 24 bicycle parking spaces, and 2 loading spaces on site. A conceptual rendering of the facility can be seen in *Figure 1*.



Figure 1: Conceptual Rendering of Proposed Five-Storey Long Term Care Facility

Figure 2: Conceptual Plan for Rezoning



3.0 SITE DESCRIPTION AND CONTEXT

3.1 SUBJECT LANDS

The subject property has a total combined area of approximately 2.79 hectares with approximately 28.00 metres of frontage on Nottingham Avenue (See *Figure 3*). Currently the subject property is vacant with rock outcrops and varied tree cover.

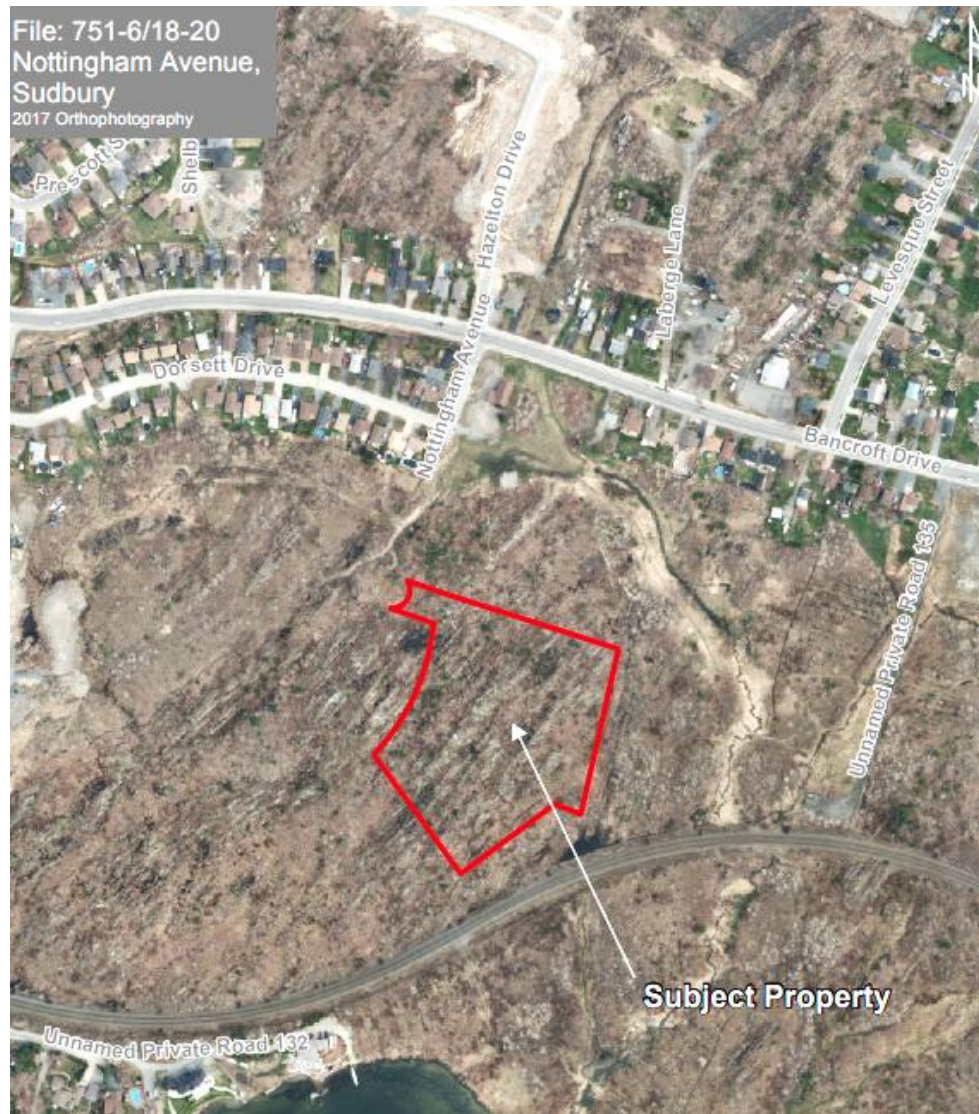


Figure 3: Location of Subject Property

The subject property is located on the east side of the newly constructed portion of Nottingham Ave, in Greater Sudbury. Nottingham Avenue is classified in Official Plan *Schedule 7* as a 'Local Road' and is constructed to an urban standard. The site will be fully serviced via municipal sewer and water services.

The lands are located within Ramsey Lake Intake Protection Zone 3 under the Source Protection Plan. An application for a Section 59 Notice was submitted concurrently with the zoning by-law amendment application.

3.2 SURROUNDING NEIGHBOURHOOD CONTEXT

The surrounding area is characterized by a mix of land uses and buildings including low and medium density residential, institutional, and open space uses. Surrounding uses can be described as follows:

NORTH: Residential, Parks and Open Space (Dorsett Tot Lot)

EAST: Undeveloped residential lands

SOUTH: Railway Line, Vacant Open Space

WEST: Undeveloped Residential Lands (approved subdivision)

3.3 PROPERTIES BACKGROUND / HISTORY

In 2019 an application for zoning by-law amendment was approved by the City of Greater Sudbury to permit a 192-bed long-term care facility on the subject site. A holding (H) symbol was placed on the property until the time in which municipal sewer and water services are made available and public road frontage exists to facilitate access and allow the severance of the subject land from the parent parcel. Such H was removed in 2020 given Nottingham has been constructed, and assumed by the Municipality.

4.0 POLICY OVERVIEW AND ANALYSIS

The following section sets out the relevant planning policy framework to assess the appropriateness of the proposed application in the context of Provincial and Municipal policies and regulations. Each subsection will outline relevant policies and provide a planning analysis with respect to how the zoning by-law amendment is consistent with or conforms to such policy.

4.1 PROVINCIAL POLICY STATEMENT, 2020

The *2020 Provincial Policy Statement* (PPS) provides high-level provincial policy direction for planning approval authorities in preparing municipal planning documents, and in making decisions on *Planning Act* applications. Municipal official plans must be consistent with the provincial policy statement. Policies applicable to the proposed zoning by-law amendment are outlined and discussed below.

Given that the subject lands are located within Greater Sudbury's Settlement Area, the following policies are applicable

"1.1.1 *Healthy, liveable and safe communities are sustained by:*

a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;

b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including Industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;

...

e) promoting the integration of land use planning, growth management, transit-supportive development, intensification, and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs

f) improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society”

1.1.3.2 *Land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

a) efficiently use land and resources;

b) are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;

...

e) support active transportation;

f) are transit-supportive, where transit is planned, exists or may be developed

1.1.3.6 *New development taking place in designated growth areas should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities”*

1.4.3 *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:*

b) permitting and facilitating:

1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and

2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3; 17 | Provincial Policy Statement, 2020

c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;

d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;

- e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and*
- f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety*

1.7.1

Long-term economic prosperity should be supported by:

- a) promoting opportunities for economic development and community investment-readiness;*
- b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce*
- c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities;*

....

- e) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes”*

Per **Section 1.1.1** of the PPS, municipalities shall accommodate an appropriate range and mix of residential uses in order to meet long-term needs, including housing for older persons and institutional uses such as long-term care homes. The increase in beds proposed through this application will provide additional, appropriate housing for older persons and those whom require an institutional setting, as supported by section 1.1.1.

The development site is located within the settlement area boundaries of Sudbury, which under **Section 1.1.3** shall be the focus of growth and development. Further many PPS policies encourage a mix of densities and land uses which efficiently use existing or planned infrastructure.

To support consistency with the above policies, the development has been designed and located in a manner which:

- Integrates land use planning and growth management in preparing for societies aging demographic, rising long term care needs and assists in addressing land use barriers which restrict vulnerable populations full participation in society by proposing intensification in a location which provides easy access to commercial, residential, open spaces, and essential services;
- Locating the facility within proximity to public transit infrastructure;
- Promoting appropriate intensification through the addition of 128 long term care beds, which will have no negative impacts to surrounding transportation networks and which will be compatible with surrounding uses given the enhanced setbacks afforded to the proposed structure;

- Achieving cost-effective development patterns and minimizing land consumption by increasing the number of storeys and more efficiently using existing site servicing;

The current zoning permits the development of a 192-bed long term care facility on the subject site. **Section 1.3.3.6** of the PPS supports new development and a mix of uses and densities adjacent to the existing built up area with a compact form that efficiently uses land, infrastructure and surrounding public service facilities. The application proposes an appropriate increase in density at this location as it is adjacent to the existing built up area, and proposes a compact form (5-storeys) which maximizes usage of the site's infrastructure, waterfront views, proximity to residential, institutional, and open spaces, and access to both active transportation and a secondary arterial road.

Further per **1.4.3** and **1.7.1(b)** the application assists in facilitating the development of housing which meets the social, health, economic and well-being requirements of current and future older adults, and in doing so responds to the dynamic market based needs arising from the City's aging demographic.

4.2 GROWTH PLAN FOR NORTHERN ONTARIO

The *Growth Plan for Northern Ontario* (GPNO) is a 25-year plan that provides guidance in aligning provincial decisions and investment in Northern Ontario. It contains policies to guide decision-making surrounding growth that promotes economic prosperity, sound environmental stewardship, and strong, sustainable communities that offer northerners a high quality of life. It also recognizes that a holistic approach is needed to plan for growth in Northern Ontario.

Section 3.4.3 of the GPNO promotes a diverse mix of land uses within northern communities. The GPNO states that:

"3.4.2 *The Province will seek to improve access to health care services for Northern Ontario residents by:*

a. supporting and strengthening health care planning and delivery approaches in Northern Ontario

3.4.3 *Municipalities are encouraged to support and promote healthy living by providing for communities with a diverse mix of land uses, a range and mix of employment and housing types, high-quality public open spaces, and easy access to local stores and services"*

The application will enhance health care access and service in Northeastern Ontario by adding 128 beds to a property with existing permission for 192-bed long term care facility. The proposed additional bed permission supports and strengthens health care planning in the north by preparing for an aging population and appropriately developing new long-term care beds to meet anticipated future needs as supported in **Section 3.4.2**. The application also supports policy **3.4.3** as it encourages and promotes healthy living principles by increasing the number of beds and institutional land use in a predominately

residential area, and thereby facilitate the creation of employment opportunities through the construction, maintenance, and operation of the long-term care facility.

4.3 CITY OF GREATER SUDBURY OFFICIAL PLAN

The 2006 *City of Greater Sudbury's Official Plan* is the principal land use planning policy document for the City of Greater Sudbury. The Official Plan (OP) establishes objectives and policies that guide both public and private development/decision-making.

The subject lands are designated 'Living Area 1' per *Schedule 1A* of the *City of Greater Sudbury Official Plan*.

Section 2.3.2 speaks to the City's settlement area and states in-part:

"2.3.2 The Settlement Area

1. Future growth and development will be focused in the Settlement Area through intensification, redevelopment and, if necessary, development in designated growth areas.

2. Settlement Area land use patterns will be based on densities and land uses that make the most efficient use of land, resources, infrastructure and public service facilities, minimize negative impacts on air quality and climate change, promote energy efficiency and support public transit, active transportation and the efficient movement of goods."

Per **Section 2.3.2.1** this application proposes intensification and facilitates future growth and development within the Settlement Area. The application recognizes the importance of allowing for a balance of densities which make the most efficient use of land, resources, and infrastructure to minimize potential negative impacts on the environment per **Section 2.3.2.2**. The application also supports the public transit and active transportation network as it is located within 220 metres from public transit service which will serve employee's and visitors of the facility.

Section 2.3.3 addresses intensification and states in-part:

"2.3.3 Intensification

1. All forms of intensification are encouraged in accordance with the policies of this Plan.

5. Intensification and development is permitted in established Living Area I lands, in accordance with the policies of this Plan.

7. Intensification will be encouraged on sites with suitable existing or planned infrastructure and public service facilities.

8. Intensification will be compatible with the existing and planned character of an area in terms of the size and shape of the lot, as well as the siting, coverage, massing, height, traffic, parking, servicing, landscaping and amenity areas of the proposal

9. *The following criteria, amongst other matters, may be used to evaluate applications for intensification:*

- a. the suitability of the site in terms of size and shape of the lot, soil conditions, topography and drainage;*
- b. the compatibility proposed development on the existing and planned character of the area*
- c. the provision of on -site landscaping, fencing, planting and other measures to lessen any impact the proposed development may have on the character of the area;*
- d. the availability of existing and planned infrastructure and public service facilities ;*
- e. the provision of adequate ingress/egress, off street parking and loading facilities, and safe and convenient vehicular circulation;*
- f. the impact of traffic generated by the proposed development on the road network and surrounding land uses;*
- g. the availability of existing or planned, or potential to enhance, public transit and active transportation infrastructure;*
- h. the level of sun -shadowing and wind impact on the surrounding public realm;*
- i. impacts of the proposed development of surrounding natural features and areas and cultural heritage resources;*
- j. the relationship between the proposed development and any natural or man - made hazards ; and,*
- k. the provision of any facilities, services and matters if the application is made pursuant to Section 37 of the Planning Act. Where applicable, applications for intensification of difficult sites may be subject to Section 19.7.”*

The proposed rezoning application is consistent with **Section 2.3.3.6** and **2.3.3.7** as it provides for appropriate density on a fully serviced site. Per **2.3.3.8** the proposed intensification is compatible with the existing and planned character of the area given a multitude of factors. These include siting the building in a manner which provides for significant building setbacks from property lines, providing for an abundance of vacant open space to both the east and south of the property, and ensuring the existing transportation network has the capacity to support the development (as found in the supporting Traffic Impact Study). Further the proposed long-term care home is of a size and provides lot coverage (18%), parking, servicing and landscaping that are appropriate in the context of its location and which meet the requirements of the zoning by-law.

Section 3.2.1 discusses Living Area 1 policies. Applicable policies to this application include:

“3.2.1 Living Area I – Communities

- 2. In medium density developments, all low-density housing forms are permitted, including small apartment buildings no more than five storeys in height to a maximum net density of 90 units per hectare.*
- 3. High density housing is permitted only in the community of Sudbury. All housing types, excluding single detached dwellings, are permitted in high density residential areas to a maximum net density of 150 units per hectare. Densities in the downtown may exceed this maximum, as set out in the Zoning By-law.*
- 4. Medium and high density housing should be located on sites in close proximity to Arterial Roads, public transit, main employment and commercial areas, open space areas, and community/recreational services.*
- 5. Medium and high-density housing are to be located in areas with adequate servicing capacity and a road system that can accommodate growth. Sites should be of a suitable size to provide adequate landscaping and amenity features.*
- 6. In considering applications to rezone land in Living Area I, Council will ensure amongst other matters that:*
 - a. the site is suitable in terms of size and shape to accommodate the proposed density and building form;*
 - b. the proposed development is compatible with the surrounding neighbourhood in terms of scale, massing, height, siting, setbacks, and the location of parking and amenity areas;*
 - c. adequate on-site parking, lighting, landscaping, and amenity areas are provided; and,*
 - d. the impact of traffic on local streets is minimal”*

This application proposes an increase in density from the previously approved zoning by-law amendment application and increases the number of beds by approximately 66.6%.

The OP states that medium and high-density housing should be located on sites near Arterial Roads, public transit, employment, commercial areas, open space areas, and community/recreational services. The proposed long-term care home is located within 220 metres of Bancroft Drive which is categorized as a secondary arterial with public transit and active transportation infrastructure to serve residents, employees, and visitors. The site is also located within proximity to institutional uses including churches, and park and recreational opportunities such as the Dorset Tot Lot and other open space. Regardless of the quantitative increase in beds & storey’s proposed, the site will have the same lot coverage and building setbacks as those currently permitted on a site-specific basis. Supporting studies have found no negative

off-site impacts associated with the use, and the site has been designed to keep parking as far from existing residences as possible. As such, the increase in beds and height is consistent with the intent of **Section 3.2.1**.

Section 4.4 outlines policies related to Institutional Areas. It states in part that:

“4.4 INSTITUTIONAL AREAS

4. In considering the establishment of new institutional uses or the expansion of existing facilities on lands not specifically designated for institutional purposes, the City will ensure that:

- a. sewer and water services are adequate to service the site;*
- b. adequate traffic circulation can be provided;*
- c. adequate parking for the public is provided on-site;*
- d. public transit and active transportation infrastructure can be provided economically for the site;*
- e. the proposed institutional use can be integrated into the area and is compatible with surrounding uses; and,*
- f. adequate buffering and landscaping is provided”*

The City of Greater Sudbury’s Official Plan promotes incorporating institutional uses into its Living Area I designation that are compatible within a residential setting including, long term care homes and retirement homes. The application is consistent with **4.4.4** of the OP which allows for the expansion of institutional uses on lands not specifically designated for institutional purposes, as there will be adequate sewer and water services to service the facility, adequate traffic circulation as identified in the supporting Traffic Impact Study, sufficient parking that meets both the zoning by-law standards and anticipated demand, public transit within walking distance to the site, and suitable buffering through landscaping and setbacks greater than those required by zoning. The proposed long-term care facility will be appropriately integrated into the surrounding area and function as an essential part of the neighbourhood and community fabric.

Section 11.4 speaks to parking and requires that:

“11.4 PARKING

- 1. New developments generally must provide an adequate supply of parking to meet anticipated demands.*
- 2. Based on a review of parking standards for various land uses in the City, parking requirements may be reduced in those areas that have sufficient capacity, such as the Downtown and other major Employment Areas”*

Per **11.4.1**, the 320-bed LTC facility provides an adequate supply of parking to meet anticipated demands and meets the minimum parking requirements of the zoning by-law. No additional parking needs are anticipated beyond the minimum zoning standards, and as such no off-site parking impact is anticipated.

Section 16.2 of the OP promotes policies which plan for Sudbury's aging population. Policies include the need to:

"16.2 PLANNING FOR AN AGING POPULATION

1) Support development that is age-friendly including the creation of smaller, unique, shared and transitional housing opportunities for an aging population through the rezoning process, where necessary, promotes 'aging in place' and is in close proximity to amenities and services in the Downtown, Regional Centres, Town Centres and Mixed Use Commercial areas;

2) Create a safe and secure physical and social environment for Greater Sudbury's aging population with supportive design standards such as sidewalk policies, curb heights, park facilities;

4) Support the creation of more affordable housing and long-term care facilities with support services for an aging population;

7) Support development that recognizes the short term and long term demand for an increase in health care service and related economic opportunities in Greater Sudbury"

As the number of older adults continues to rapidly increase, it is essential to create environments which reflect the needs and capabilities of this population. Per **Section 16.2** this development aims to further increase the availability of long-term care type housing in the northeast to address the needs of seniors and persons with disabilities.

Both the Official Plan and *City of Greater Sudbury Age Friendly Community Action (AFC) Action Plan* recognize the importance of promoting aging in place. However, the AFC also understands that '*many individuals are unable to develop environments that are ... appropriate, healthy, and supportive ... in which each can perform optimally and are being compensated for a decreasing vitality and overall health status*'. Whilst the importance of transitional housing opportunities for seniors is understood, the increase in permitted beds proposed through this application also recognizes the immediate need for long term care facilities and their importance following the use of transitional housing options.

Under **Section 16.2.4** of the Plan the City shall support the growing health care needs of the elderly, by supporting the creation of housing such as seniors' apartments, assisted-living complexes, and nursing homes (long-term care facilities). As supported in **Section 16.2.4**, the application will facilitate the construction of a 320-bed long term care facility with support services for the communities aging population. Further, the development will assist in addressing both short term and long-term demand for long term care beds, and health care service in Greater Sudbury per policy **16.2.7**.

Section 17.2 of the OP details policies related to housing.

“17.2.6 Supportive Housing

In order to address the City’s supportive housing needs, it is policy of this Plan to:

- a. facilitate the provision of a variety of appropriate housing types in various locations designed to meet supportive housing requirements for the elderly, students, people with children, persons with physical disabilities and others with special needs;*
- b. integrate supportive housing within existing neighbourhoods and communities throughout the City on a scale compatible with neighbourhood design”*

Per **Section 17.2.6** the application proposes increasing the supply of supportive housing (number of long-term care beds permitted) and in doing so provides for more housing for elderly, and persons with physical disabilities and others with special needs. The application will optimize the subject lands to provide additional supportive housing, while maintaining a built form and intensity of use that will have no negative impacts on the surrounding residential neighbourhood.

4.4 ZONING BY-LAW AMENDMENT APPLICATION

As discussed, the subject property is zoned ‘Institutional- (H49)I49’ in the *City of Greater Sudbury Zoning By-Law 2010-100Z*.

Institutional- I(49)- Long Term Care Facility

- (i) The only permitted uses shall be a long-term care facility containing a maximum of 192 beds along with accessory uses that are directly related to the primary use being that of a long-term care facility;*
- (ii) The maximum building height shall be three (3) storeys; and,*
- (iii) The minimum lot frontage shall be 28 metres.*

The “H49”, Holding symbol will be removed by Council once municipal water and sanitary services are available to service the development and public road frontage exists for the property.

The proposed zoning by-law amendment proposes to rezone the subject lands ‘Institutional Special’ to permit the development of a 320-bed long term care facility. *Table 1* provides an outline of the proposal developments consistency with the institutional zone.

Table 1: Zoning Table

| INSTITUTIONAL ZONE | ZONING BY-LAW REQUIREMENT | PROVIDED |
|----------------------------|---------------------------|---------------|
| Min Lot Area | 900.0m ² | 2.79 hectares |
| Minimum Frontage | 30.0m | 28.0m |
| Front Yard | 10.0m | 34.3m |
| Interior Side yard Setback | 10.0m | 34.4m |
| Side yard Setback | 10.0m | 31.89m |
| Rear Yard | 10.0m | 62.2m |
| Lot Coverage | 50.0% | 18% |
| Maximum Height | 50.0m | Approx. 21.0m |

The proposed building height is five-storeys, and the properties large overall area affords generous setbacks from the lot lines as identified in *Table 1*. These setbacks which will mitigate any impacts on the future residential subdivision development abutting the site. Three metre wide landscaping strips – pursuant to by-law requirements - will be installed to address screening and buffering concerns from both the neighbouring residential area and provide privacy for residents of the long-term care facility. Additionally, the significant setbacks proposed for the development will allow additional screening/buffering that are over and above by-law requirements.

5.0 ANALYSIS SUMMARY

LOCATION, BUILT FORM AND LAND USE COMPATIBILITY

Applications for rezoning lands in Living Area 1 are (generally) reviewed pursuant to policy found in **Section 3.2.1** of the OP. Applications for intensification are reviewed under **Section 2.3.3** and applications to permit new institutional uses or the expansion of existing facilities on lands is evaluated under **Section 4.4**. These sections of the OP have been reviewed to determine the appropriateness of the proposed development and increase in long term care beds.

It is the authors opinion that the proposed development is an appropriate location for the establishment of a 320-bed long term care facility given the following:

- The site has a total lot area of 2.79 hectares where a minimum lot area of 900m² is required and provides the land necessary to accommodate both the building, proposed density and 160 parking spaces;
- The proposed development is compatible with the surrounding neighbourhood in terms of scale, massing, height, siting, setbacks and the location of parking and amenity areas. No accessory uses – other than those for the use of immediate residents of the facility – are proposed;
- The long-term care facility will be 5 storeys in height and provides for a front yard setback of 34.3m where 10.0 m is required, a rear yard setback of 62.2m where 10.0 metres is required, an interior side yard setback of 34.4 and 31.89m where 10.0m is required;
- The application provides for on-site parking, lighting, and amenity areas which are appropriate for both the proposed use and compatible with the existing vacant, parks and open space and residential areas;

- The application proposes to provide significant setbacks and on-site landscaping/planting to mitigate any off-site impacts on abutting uses including providing 3.0 wide landscaping strips adjacent to all residential lot lines to address screening and buffering concerns and provide privacy for residents of the long-term care facility;
- The application proposes a 66.66% increase in density from what is currently permitted on site and in doing makes for a more efficient use of the site and future infrastructure, while accommodating such density increase through a minor (2-storey) increase in permitted height and no increase in proposed building footprint/lot coverage;
- The impact of the development on local streets will be minimal as identified by the Traffic Impact Study;
- No issues related to soil or drainage have been identified;
- The site is located within 220.0 metres of public transit and has access to active transportation infrastructure along Bancroft Drive;
- In 2017 a study was conducted to assess potential for habitat for SAR Whip-poor-will. The analysis determined that the proposed development does not encroach into Category 1 and 2 habitat and that the development site is approximately 60 metres from the delineated 9 hectare whip-poor-will territory and therefore the proposal conforms to the 2020 PPS as it relates to Species at Risk; and,
- No natural or man-made hazards such as floodplains have been identified on the subject lands.

COMMUNITY NEED

Much like the rest of Canada, changing demographics will have an important influence on the City of Greater Sudbury over the next several decades. The City's Official Plan identified that in 2011, 29% of the City's population was over the age of 55 and 11% was over the age of 70. By the year 2036, this will have increased to 34% and 20%. As the number of older adults is rapidly increasing, it is essential to create environments which reflect the needs, desires, and capacities for this aging population.

Recent world events such as the COVID-19 pandemic have heightened concerns related to lengthy wait lists and a lack of beds at long term care homes across the province. Given such demand, it is both appropriate and necessary to plan for and construct more long-term care facilities in the coming years in those locations that are deemed appropriate. By increasing the number of long-term care beds this application supports older adults transitioning to appropriate housing, provides for greater housing options and provides seniors access to necessary healthcare in an appropriate location given abutting uses and other mitigating measures to enhance compatibility.

This application supports official plan **Sections 16.2** and **17.2** as it seeks to ensure that a diversity of housing choices are available to support older and aging adults. Further, the application aims to facilitate development that recognizes the short term and long-term demand for an increase in health care service and seniors housing opportunities both in the City of Greater Sudbury and Northeastern Ontario.

LOCAL TRAFFIC IMPACTS

A Traffic Impact Study was conducted by Tatham Engineering in September 2020 in order to evaluate the potential traffic impacts of the proposed development on the surrounding neighbourhood and road infrastructure.

Overall, the study determined that:

- Upon build-out, the development is expected to generate 61 new trips during the AM peak hour and 84 new trips during the PM peak hour;
- The operational analyses indicated that the subject intersections would provide good (LOS C or better) overall conditions through the 2030 horizon under the future total conditions and no intersection improvements are required;
- Given the minimal volumes on Nottingham Avenue at the proposed site, and the limited volumes that the site will generate, excellent traffic operations will be provided at the site access;
- The need for exclusive right and left turn lanes on Bancroft Drive at Nottingham Avenue based on the projected volume of right and left turning vehicles are not warranted;
- The available sight lines along Nottingham Avenue are considered appropriate in consideration of TAC design guidelines for minimum stopping sight distance.

Section 2.3.3.9 (f) and **Section 3.2.1.6(d)** of the Official Plan speak to intensification and considering applications to rezone land in Living Area I as it relates to the impact of traffic generated by the proposed development on the road network and surrounding land uses. The Traffic Impact Study found no concerns related to future traffic volumes, intersection operations, infrastructure improvements or sight line issues.

6.0 CONCLUSION

The application is consistent with the 2020 Provincial Policy Statement policies applied to settlement areas and housing by providing for an appropriate range and mix of residential uses in order to meet long-term needs, including housing for older persons and institutional uses such as long-term care homes on municipal infrastructure.

The application conforms to and does not conflict with the Growth Plan for Northern Ontario as the Plan contains various policies under **Section 3.4.2** that promote improving access to health care services including long-term care facilities and other special needs facilities. It also supports **Section 3.4.3** in that it promotes healthy communities by providing for a range of uses and housing forms.

The proposed zoning bylaw amendment application conforms to Official Plan policies in that:

- The subject land is in the Living Area 1 OP designation, which permits compatible institutional uses;
- The lot is suitable for the proposed use based on its location and proximity to infrastructure and municipal services, the proposed built form and availability of on-site parking;
- No upgrades to the existing road network are required to accommodate the proposed long-term care facility;
- The proposed institutional use can be integrated into the area while addressing compatibility with existing and future residential uses with adequate separation and the setbacks from lot lines exceeding minimum zoning requirements;
- The site located approximately 220 metres from public transit and active transportation infrastructure located along Bancroft Drive;
- The long-term care facility addresses the demand for special needs facilities in the community

Given the analysis provide herein, it is the authors opinion that proposed zoning by-law amendment to increase LTC bed permission from the currently permitted 192 beds to 320 beds is consistent with the 2020 PPS, does not conflict with the *Growth Plan for Northern Ontario*, conforms to the *City of Greater Sudbury Official Plan*, and represents good planning.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Jarus', written in a cursive style.

Kevin Jarus, M.Pl., MCIP, RPP.
Senior Planner | Project Manager