



PLANNING JUSTIFICATION REPORT

700 PARIS STREET, SUDBURY

OFFICIAL PLAN & ZONING BY-LAW AMENDMENT APPLICATIONS

DECEMBER 2023



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1.0 | INTRODUCTION

1.0 INTRODUCTION

PROJECT OVERVIEW

TULLOCH has been retained by 2226553 ONTARIO INC. (Panoramic Properties Inc.), the owner of 700 Paris Street in the City of Greater Sudbury, to prepare a Planning Justification Report as part of complete applications to amend the *City of Greater Sudbury Official Plan* and the *City of Greater Sudbury Zoning By-Law 2010-100Z*.

The proposed development and associated amendments seek to redevelop the site through the delivery of three new residential buildings along with limited commercial (restaurant) uses on a ±1.78-hectare site generally situated between Paris Street and Bell Park on the eastern edge of Sudbury's Kingsmount-Bell Park neighbourhood.

The proposed development will positively contribute to Sudbury's Ramsey Lake waterfront as well as is responsive to provincial and municipal targets of creating 3,800 more homes in Greater Sudbury by 2031, through the delivery of a distinctive urban waterfront development that provides a total of 421-residential units, 109-retirement guest suites, and 380m² of restaurant floorspace. The development has been designed to respond to the surrounding natural and built context, which is evident in the architecture, site design, and related public realm and landscaped improvements (See *Figure 1*).

To permit the proposed redevelopment, amendments to the *City's Official Plan* and to the *Zoning By-Law 2010-100Z* are required. This report provides a land use planning analysis and justification for the Official Plan Amendment needed to permit a density of 237-units per hectare where densities above 150 units per hectare are only permitted in the Downtown land use designation and to permit 380m² of commercial space (i.e. restaurant uses) where a maximum of 150m² is permitted in the Living Area 1 designation, and the Zoning By-law Amendment required to rezone the subject lands from the existing "R4(3)", High Density Residential Special Zone to an amended "R4(3)", High Density Residential Special Zone with revised site standards for height, setbacks, etc., and an added land use permission in the form of a Restaurant use.

The legal description of lands is as follows:

PIN 73584-0652, PT S1/2 LT 5 CON 3 MCKIM AS IN S116343; GREATER SUDBURY
PIN 735910047, PT N1/2 LT 5 CON 2 MCKIM PT 2, 53R3947; GREATER SUDBURY

This Planning Justification Report reviews the consistency and the conformity of the planning applications within the context of applicable land use policies found within the:

- *2020 Provincial Policy Statement;*
- *Growth Plan for Northern Ontario;*
- *City of Greater Sudbury Strategic Plan;*
- *City of Greater Sudbury Official Plan;*
- *Greater Sudbury Community Energy and Emissions Plan;*
- *Ramsey Lake Community Improvement Plan; and,*
- *City of Greater Sudbury Zoning By-Law 2010-100Z.*

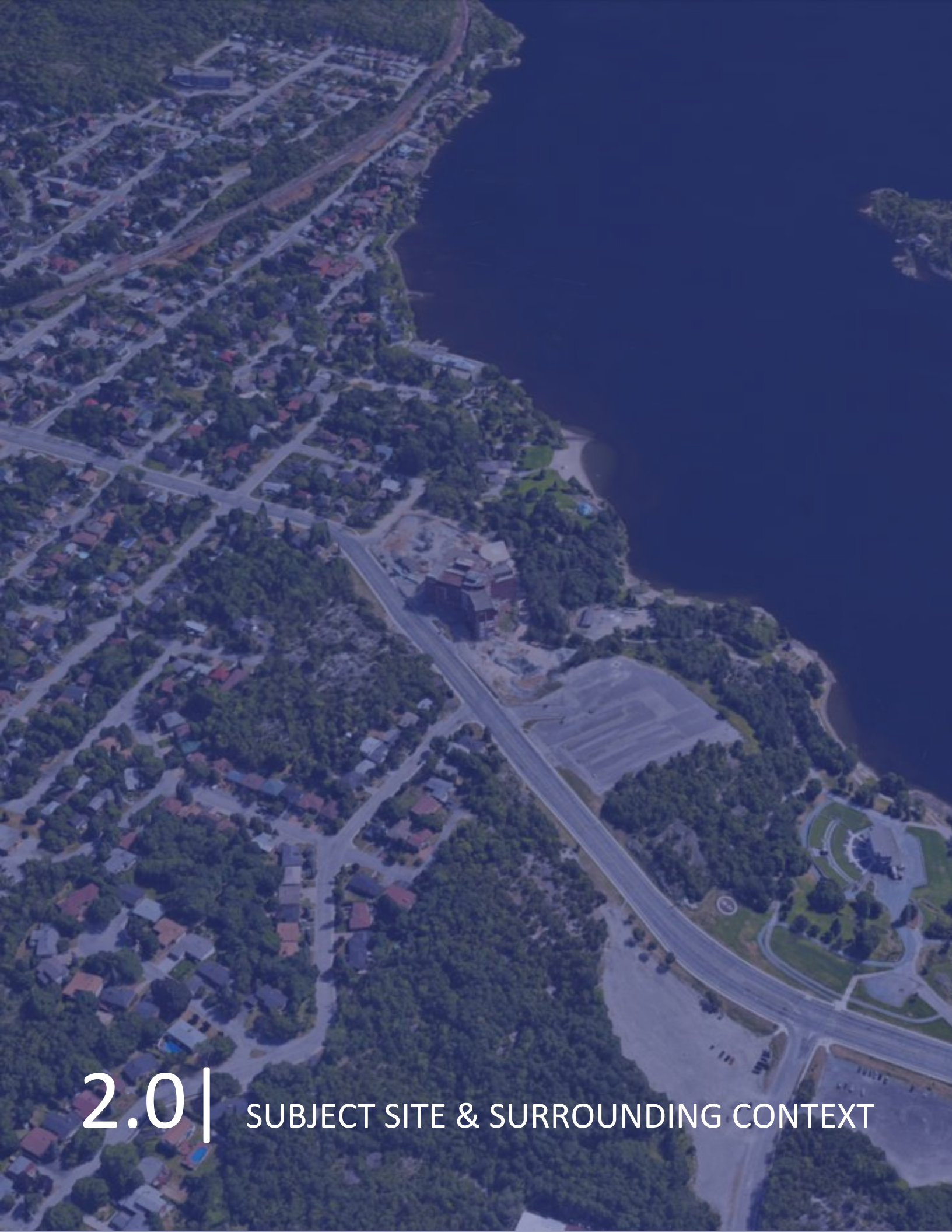
REPORT INTENT

The Planning Justification Report comprises the following sections:

- **Section 1.0** introduces the development proposal and describes the purpose of this report.
- **Section 2.0** introduces the subject site and the surrounding area context.
- **Section 3.0** describes the proposed development in detail including several architectural renderings.
- **Section 4.0** outlines all supporting technical studies that have been completed in support of the development proposal and the required applications for Official Plan and Zoning By-law Amendment.
- **Section 5.0** describes the land use planning policy context applicable to the subject site including provincial, and municipal planning policy, and the development proposal's response to these policies.
- **Section 6.0** provides a summary of the land use planning rationale in support of the development proposal and conclusions of the report.



Figure 1: Proposed Development from Paris Street/ East Perspective (ACK Architects).



2.0 |

SUBJECT SITE & SURROUNDING CONTEXT

2.0 SUBJECT SITE & SURROUNDING CONTEXT

This section describes the subject site including its topography and other site features, the surrounding neighbourhood context, transit and transportation network access, along with a description of the property's historic context.

SUBJECT SITE

The subject parcel is located at the corner of Paris Street and Facer Street in the Kingsmount-Bell Park neighbourhood abutting Bell Park. The subject property has an area of approximately 1.78ha with approximately 69.0-metres of frontage on Facer Street and approximately 233.0-metres frontage on Paris Street (see *Figure 2*).



Figure 2: Approximate Location of Subject Lands

EXISTING BUILDING & USE

The subject site was originally used as the location of the *Sudbury General Hospital of the Immaculate Heart of Mary* (i.e. St. Joseph's Health Centre or 'the General Hospital'), which opened in 1950 (See *Figures 3-4*). The existing building is recognizable by its brick façade along with a steel beam grid system and a building height that varies between a 6-storey building face along Paris Street and an 8-storey building face along Bell Park Road.

At the time of the hospital's closing in March 2010, it accommodated 326-beds. The subject site was then acquired by the existing property owner in July 2010 and has remained largely in its existing state (other than limited structure demolitions) since that time.



Figure 3: View of the former St. Joseph's Hospital from Paris Street (Image: Google Maps, August 2012).



Figure 4: View of the former St. Joseph's Hospital from Facer Street (Image: Google Maps, May 2012).

From 2013 through 2014, portions of the former hospital were demolished including the Mason Residence located at the north end of the site next to Facer Street and the southerly wing and chimney stack of the hospital located to the south of the site.

In August of 2019, the property owner agreed for the building to be used as a canvas for the creation of a 687m² mural as part of Up Here Festival - an annual art and music festival. The mural created by graffiti artist RISK seen in is now the largest mural in Canada (See Figure 5-9).

TOPOGRAPHY AND SITE FEATURES

The subject site is largely unvegetated with a sloping topography and grade change between its Paris Street and Bell Park Road (See Figure 10). The site does not contain any floodplain, watercourses or other natural features and as such is not subject to Conservation Sudbury’s regulations for fill or construction. The site is however located within the Ramsey Lake Watershed and a *Section 59 Source Water Protection Application* will be submitted as part of the Official Plan and Zoning By-law Amendment applications.



Figure 5: View of existing building from Bell Park Road



Figure 6: View of Subject Lands from Bell Park Road



Figure 7: View of rear of existing building looking north towards Facer Street



Figure 8: View of existing building looking south along Paris Street



Figure 9: View of existing building looking North along Paris Street



Figure 10: Southerly side of the subject lands

SURROUNDING NEIGHBOURHOOD CONTEXT

The subject site is located within a wider area known as the Kingsmount-Bell Park neighbourhood. Surrounding land uses can be described as follows (see Table 1):

Table 1: Surrounding Land Uses

NORTH	Low to Medium Density Residential & Downtown Sudbury
SOUTH	Municipal Parking Lot and Bell Park

EAST	Bell Park & Ramsey Lake
WEST	Vacant Lands and Low Density Residential

To the west of Paris Street and north of Facer Street is an established low density residential neighbourhood dating from the early 1900s (See Figures 11-16). These single detached homes vary in height from 1-3 storeys.



Figure 11: View of new Single Detached Dwelling along Ramsey Road



Figure 12: View of single detached dwellings along Facer Street looking north



Figure 13: View of single detached dwellings along Boland Avenue looking northwest



Figure 14: View of single detached dwelling and personal service shop west of subject lands



Figure 15: View of single detached dwellings north of subject lands (East side of Paris Street)



Figure 16: View of single detached dwellings and bed and breakfast north of subject lands (west side of Paris Street)

To the south and east are City owned parklands known as Bell Park (See Figures 17-19). Bell Park is located on the western shores of Ramsey Lake and is the City's largest urban waterfront park. The park includes many recreational opportunities including the Grace Hartman Amphitheatre, Ramsey Lake boardwalk, gazebos, flowerbeds, children's play structures, outdoor workout equipment, and supervised and unsupervised beaches. The park is the site of many cultural and recreational events in the City.



Figure 17: View of Bell Park Gazebo looking southeast over Ramsey Lake



Figure 18: View of Bell Park Beach looking east towards Ramsey Lake



Figure 19: View of Pitter Patter Park (outdoor exercise equipment) looking west towards subject lands

A City owned parking lot consisting of approximately 290-parking spaces abuts immediately to the south of the subject lands (See *Figure 20-22*). Access to the City parking lot currently traverses a southerly portion of the subject site at the driveway entrance on Paris Street.



Figure 20: View of City owned parking lot/lands looking south



Figure 21: View of entrance to City owned parking lot/lands looking west along Paris Street



Figure 22: View of City owned parking lot/lands looking north

Sudbury's Downtown is located approximately 800-metres from the subject site. Downtown Sudbury is the urban heart of the city and is regarded as a centre for business, culture, retail, dining, entertainment, and government activities.

TRANSPORTATION, TRANSIT & ACTIVE TRANSPORTATION

The subject site fronts on the east side of Paris Street which is categorized as a Primary Arterial Road under *Schedule 7* of the *City of Greater Sudbury's Official Plan*. Facer Street is categorized as a Local Road and Bell Park Road is classified as a Private Road.

The site abuts and is serviced by two bus routes on the City's GOVA Transit system - Transit Route #1 (Main Line) is a high frequency service line connecting Sudbury's South End to the New Sudbury Centre and Transit Route #4 (Laurentian U via Paris) is a high frequency line connecting Downtown Sudbury to Health Sciences North and Laurentian University.

- Route #1 travels from the South End Walmart to New Sudbury Centre via Long Lake Road, Paris Street, Notre Dame Avenue and LaSalle Boulevard and includes a bus stop at the Downtown Transit Hub and Health Sciences North. The route provides service:
 - On weekdays with buses running every 15 minutes between 6:15 a.m. and 8:45 p.m. then every 30 minutes until the end of the service day

- On weekends with buses running every 30 minutes between 7:15 a.m. and 10:15 a.m., every 15 minutes between 10:15 a.m. and 6:45 p.m. then every 30 minutes to the end of the service day. To the South End, buses run every 30 minutes between 7:30 a.m. and 10:30 a.m., every 15 minutes between 10:30 a.m. and 6:30 p.m. then every 30 minutes to the end of the service day.
- Route #4 travels from the Downtown Transit Hub to Laurentian University via Cedar Street, Elgin Street and Paris Street and includes a bus stop at Health Sciences North. The route provides service:
 - On weekdays with buses running every 30 minutes between 7:15 a.m. and 9:45 a.m. and 1:45 p.m. and 5:45 p.m.

There is an existing bus stop along the property’s Paris Street frontage as well as a bus stop located at the corner of Boland Avenue and Paris Street.

The site is well connected to the City’s active transportation network with sidewalks located along both sides of Paris Street, and future bike lanes proposed along the property’s direct frontage through the City’s Paris-Notre Dame Bikeway project. Construction of this portion of the bikeway is planned through 2024-2025.

Further opportunities for active transportation and passive recreation can be found in Bell Park, which features a range of pedestrian trails in addition to the Ramsey Lake Boardwalk, Bell Park beach, playgrounds, outdoor workout equipment, Bell Park Skating Path and programmable space that can host community events. These trails also act as connecting active transportation links between the Downtown, York Street, and Science North/the current Hospital.

FORMER ZONING BY-LAW AMENDMENT

In 2012, the existing property owner applied for a Zoning By-law Amendment to rezone the property from “I”, Institutional and “P”, Park to “R4”, Residential High Density to permit the development of a total of 190 dwelling units, a 3,691m² wellness centre comprised of a wellness clinic, exercise rooms, pool and fitness facility and a 418m² restaurant on the former helipad.

Following public consultation efforts and public concern regarding the proposed commercial uses, the applicant revised the proposal to remove the restaurant and wellness centre and increased the number of dwelling units to 210 units with a 332-space parking garage and a further 20 parking spaces at grade.

In October 2012, Planning Committee approved the rezoning application and Council enacted an amending zoning by-law to facilitate the development with the following site-specific development standards:

R4(3) Notwithstanding any other provision hereof to the contrary, within any area designated R4(3) on the Zone Maps, all provisions of this By-law applicable to the [R4](#) Zone shall apply subject to the following modifications:

i) The lot line abutting Paris Street shall be deemed to be the front lot line.

ii) The only permitted uses shall be multiple dwellings with a maximum of 210 dwelling units of which, a maximum of 85 dwelling units shall be permitted in a new building to be located on the lot after November 20, 2012.

iii) The maximum number of multiple dwelling buildings permitted on the lot shall be two.

iv) The existing building as located on the lot shall be permitted and the enlargement of the existing building shall be permitted within the setbacks to the existing building.

v) Notwithstanding (iv) above, the maximum addition permitted to the existing helipad structure shall be one storey located above the helipad platform.

vi) The minimum setback from Facer Street to a multiple dwelling shall be 55 metres.

- vii) The minimum setback from the rear lot line and interior side lot line to a parking structure shall be 2 metres.*
- viii) The minimum setback from the rear lot line and interior side lot line to multiple dwelling units in a building located above a parking structure shall be 7.5 metres.*
- ix) The maximum building height shall be eight storeys and 32 metres.*
- x) The minimum setback from the front lot line to a multiple dwelling comprising a new building to be located on the lot after November 20, 2012, shall be 11.3 metres.*
- xi) The maximum number of surface parking spaces on the lot not including loading spaces shall be 20.*
- xii) The minimum width of a landscape strip abutting Paris Street shall be 2.6 metres and from Paris Street to the existing building the minimum width of the landscape strip shall be 1.3 metres.*
- xiii) Loading spaces shall also be permitted in the corner side yard.*

Following the approved rezoning, the applicant then proceeded through the City's site plan control application process.



Café

3.0 | DEVELOPMENT PROPOSAL

3.0 DEVELOPMENT PROPOSAL

This section describes the proposed development in detail, including a discussion of the residential and commercial uses, public realm improvements and design, massing, and height considerations.

PLANNING APPLICATIONS

The lands are proposed to be developed to accommodate a mixed-use, high-rise development of varying residential tenure and type along with 380m² of restaurant space (See Figure 24).

To advance the proposed redevelopment, amendments to both the City's *Official Plan* and to the *Zoning By-Law 2010-100Z* are required.

An Official Plan Amendment is required to permit a density of 237-units per hectare (421 units/ 1.78ha) where such is only permitted in the Downtown land use designation and to permit 380m² of restaurant use where a maximum of 150m² local commercial use is permitted.

A Zoning By-Law Amendment is required to rezone the subject lands from "R4(3)", High Density Residential Special to an amended "R4(3)", High Density Residential Special Zone with site-specific development standards to accommodate the proposed built-form, and permission to add a restaurant use.

To promote land use compatibility and place the buildings most appropriately on the site, the following development standards are proposed as part of the amending zoning by-law:

- That a maximum of three building be permitted on the lands, consisting of the following:
 - A 109-guest room Retirement Home with maximum building height of 40.0-metres (12-storeys);
 - A 199-unit Multiple Dwelling with a maximum building height of 56.0-metres (16-storeys);
 - A 222-unit Multiple Dwelling with a maximum building height of 68.2-metres (20-storeys); and,
 - With all buildings having permission for 1-3 levels of below grade shared parking levels (storeys).
- To require a minimum corner side yard setback (along Facer Street) of 18.0-metres

In addition to the above the development proposal requires the following site-specific relief:

- To permit a lot area of 41m² per multiple dwelling unit where 65.0m² is required;
- To permit a rear yard setback of 0.0-metres where 25.0-metres would be required;
- To permit an interior side yard setback of 0.0-metres where 21.0-metres would be required;
- To only require a minimum court of 15.0-metres between multiple dwellings where typically 50% of the height of the higher of such walls would be required and,
- To permit a maximum building height for a 222-unit multiple dwelling (i.e. Building B) of 20-storeys and 69-metres where a maximum height of 63.0-metres is permitted.

RESIDENTIAL AND COMMERCIAL USES

The proposed development provides for an urban residential development with ancillary restaurant uses.

199-UNIT MULTIPLE DWELLING BUILDING (URBAN LOFT/ STUDIO APARTMENTS)

Referred to as Building A, the 16-storey (56.0m) building situated at the southern end of the parcel is proposed to have 199 multiple dwelling units intended for market rental purposes. The residential apartment units will be located on floors 1 to 16 of which at this time, 32.5% (64-units) are proposed to be 1-bedroom units, 66.5% (133units) are proposed as 2-bedroom units, and 1.0% (2-units) will be 3-bedroom units. Each residential unit will benefit from a private balcony. Common amenity spaces for residents will be provided on the 1st floor (i.e. common area, gym, games room), 2nd floor (i.e. common area), and 13th floor (i.e. outdoor amenity space).

Pedestrian access to Building A is provided via the residential lobby area at grade along Paris Street and via an entrance to the east along Bell Park Road.

222-UNIT MULTIPLE DWELLING BUILDING (CONDOMINIUM)

Referred to as Building B, the 20-storey (68.2m) building is proposed to have 222 condominium units for freehold tenure. The residential condominium units will be located on floors 1 to 20 of which 17.1% (38-units) will be 1-bedroom units, 68.0% (151-units) will be 2-bedroom units, and 14.9% (33-units) will be 3-bedroom units. Each residential unit will benefit from private amenity space in the form of a balcony. In addition to private balconies, common amenity space for residents will be provided on the 1st floor (i.e. common area), 13th floor (i.e. outdoor amenity space), 14th floor (i.e. outdoor amenity space), and 20th floor (i.e. common area).

Pedestrian access to the building is provided via the residential lobby at grade along Paris Street and via an entrance along Bell Park Road.

109-GUEST ROOM RETIREMENT HOME

Referred to as Building C, this 12-storey (40.0m) building is proposed as a 109-guest room retirement home, situated at the north/central area of the parcel facing both Paris St and Facer St. Each guest room will benefit from a private balcony. A total of 123.8m² of accessory health/medical space is proposed.

Parking for the building will be provided via a 1-storey underground parking garage, which is connected to the rest of the residential development. Visitor parking for the retirement home is provided via 6 surface-level parking spaces. Pedestrian access to the building is provided via the residential lobby on the ground floor along Paris Street.

RESTAURANT USE

The development proposal also requires permission for 380m² of Restaurant use across the site, where only 150m² of Local Commercial use is permitted in the Living Area 1 designation.

BUILDING B RESTAURANT

A 288m² restaurant with ±149m² of indoor dining is proposed on the 20th floor of Building B. The restaurant will be open to the public and will feature panoramic views of Ramsey Lake with capabilities for outdoor dining and private events via a ±139m² covered rooftop terrace.

Pedestrian access to the restaurant will be provided through Building B via the main lobby at grade along Paris Street.

BUILDING C CAFE

The development proposal also includes ±85.0m² of restaurant space on the ground floor of Building C which is anticipated to take the form of a small café/restaurant open to the public. Six surface-level parking spaces are dedicated for the proposed use.

PARKING

The majority of the vehicle parking will be located below grade in a 3-storey underground parking garage which can be accessed from Bell Park Road and Paris Street. A total of 647-vehicle parking spaces will be provided within the parking structure. Entrance and exit to the underground parking structure will be accessed via three points - first via the southerly entrance at Building A, the second via the Bell Park Road entrance between Buildings A and B, and the third via a northerly entrance to Building B.

Parking spaces that are required for the proposed restaurant uses and visitor parking for the retirement home will be provided via surface parking with a total of 55-spaces. A breakdown of the parking across the entire site can be found in *Table 2*.

No relief from zoning by-law parking requirements for vehicle parking, accessible parking, loading spaces, and bicycle parking is required. **Section 5.5.1.1** of the City’s Zoning By-Law states that, “... where a Multiple Dwelling, Long Term Care Facility or Retirement Home is permitted and the lot is directly abutting a GOVA route, the number of required parking spaces may be reduced by 10% of the minimum required parking spaces.” **5.3.1** of the City’s Zoning By-Law states that, “... where a commercial use is permitted and the lot is directly abutting GOVA Routes, the number of required parking spaces associated with commercial uses are permitted to be reduced by 10% of the minimum required parking spaces.”

Table 2: Parking Spaces Breakdown

PROPOSED PARKING			
BUILDING	USE	REQUIRED PARKING	# OF PARKING SPACES PROVIDED
Building A	199-residential dwelling units Urban Lofts/ Studio Apartments (i.e. Multiple Dwelling)	1.35 spaces/unit 199 x 1.35 = 269 Spaces (inc. 10% GOVA reduction)	269 Spaces
	222-residential dwelling units Condominium Building (i.e. Multiple Dwelling)	1.35 spaces/unit 222 x 1.35 = 300 Spaces (inc. 10% GOVA reduction)	300 Spaces
Building B	288m ² Restaurant Use	1/12.5m ² 287.4/12.5 = 21 spaces (inc. 10% GOVA reduction)	21 Spaces (at grade)
	109-guest rooms Seniors Residence (i.e. Retirement Home)	109-guest rooms = 51 Spaces (inc. 10% GOVA reduction)	51 Spaces (6 visitor spaces at grade)
Building C	85.0m ² Restaurant Use (i.e. Café)	1/12.5m ² 85.0/12.5= 6 spaces (inc. 10% GOVA reduction)	6 Spaces (at grade)
	TOTAL	647 Spaces	647 Spaces

PUBLIC REALM

Significant public realm improvements will also be provided along the Paris Street and Facer Street frontages, through the implementation of streetscape/landscaping and road improvements. The integration of these public realm improvements

will promote a strong sense of place, foster social interaction, and support a positive pedestrian experience. Significant streetscape improvements such as the widening of sidewalks, bike lanes, and introduction of a bus lay-by are proposed. The introduction of landscaped areas and vegetated strips along the property's outer boundaries will enhance this stretch of Paris Street, promote sustainability, and a healthier, more beautiful and climate friendly neighborhood. The benefits will be experienced by both new residents living within the development, as well as the neighbourhood's existing residents and make a positive contribution towards the building of a healthy and complete local community.

DESIGN, MASSING & HEIGHT

The proposed development incorporates a context-sensitive approach to its design and massing. The proposed massing and orientation have been designed to respond to the surrounding urban context while at the same time balancing its proximity to a large urban park.

The combined effect of the arrangement, volume and shape of the buildings on the subject site is an important consideration as it relates to good urban design and the development of high-quality spaces. To reduce impacts related to massing, the development proposal is comprised of three buildings, which have been articulated using step-backs and enhanced corner side yard setbacks to the adjacent low-density properties (*See Figure 23.*)

Height determines the impact of development on views, vistas and skylines. The development features three buildings at varying heights (i.e. 12-storeys, 16-storeys and 20-storeys). The three-building design results in floor plate sizes that lead to slimmer buildings. This along with other innovative design solutions assist in reducing the visual and physical impact (i.e. massing) that are sometimes associated with tall buildings. Such building design with podiums and step-backs tend to be preferred over slab-style building design where important views need to be protected. Most significantly, the buildings have been positioned to ensure that views toward Ramsey Lake from and along the Paris Street corridor are maintained, which was an integral design component within the context of the overall site design.

The buildings have been architecturally massed and detailed in ways that animate and lighten their facades through a range of building materials and façade treatments, such as brick, concrete, metal, and glass. The development will include sustainable building design measures as well as high quality and durable materials - ensuring the longevity of the development and its resilience to climate change over time.



Figure 23: Conceptual Rendering of the Development looking west ((ACK Architects).

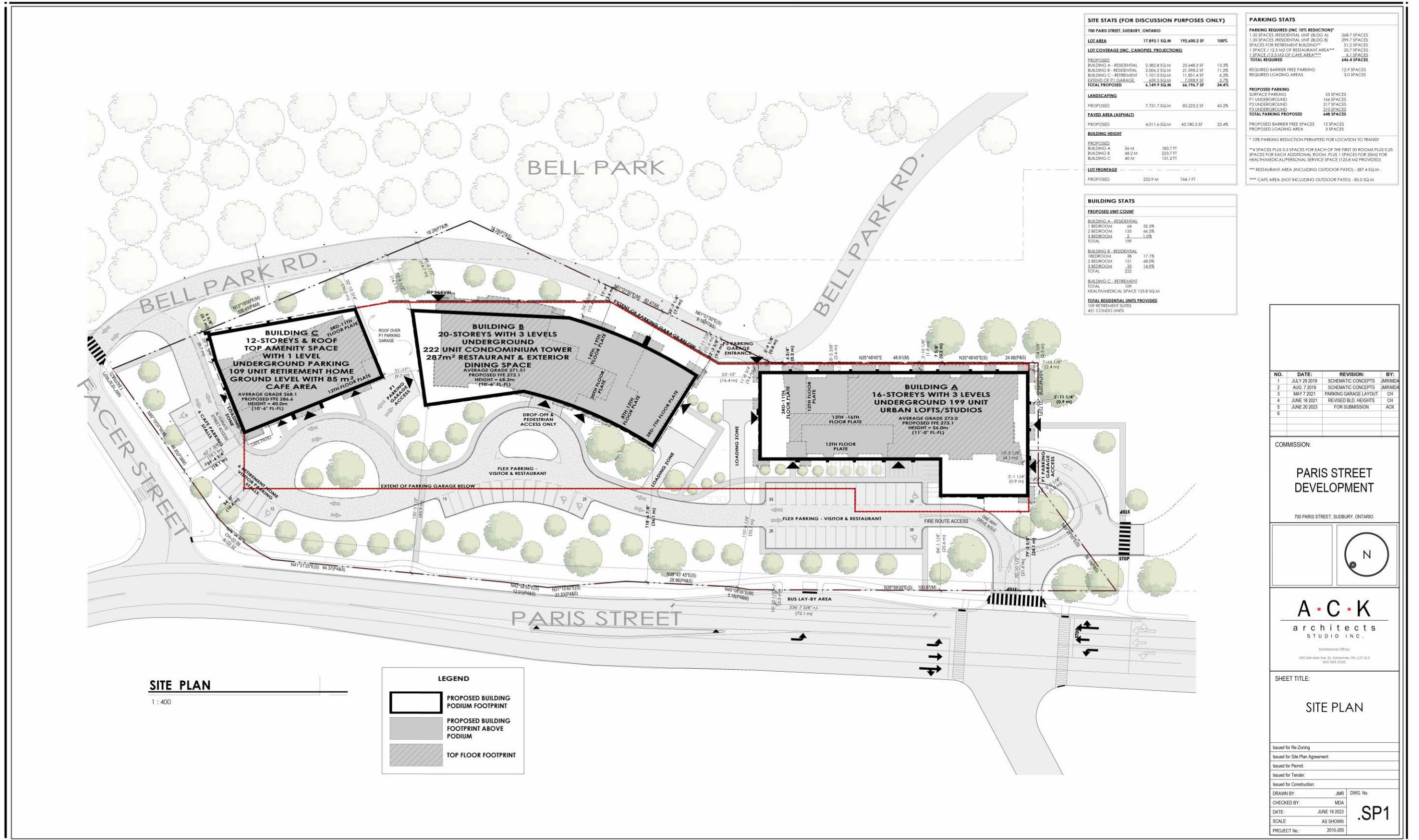
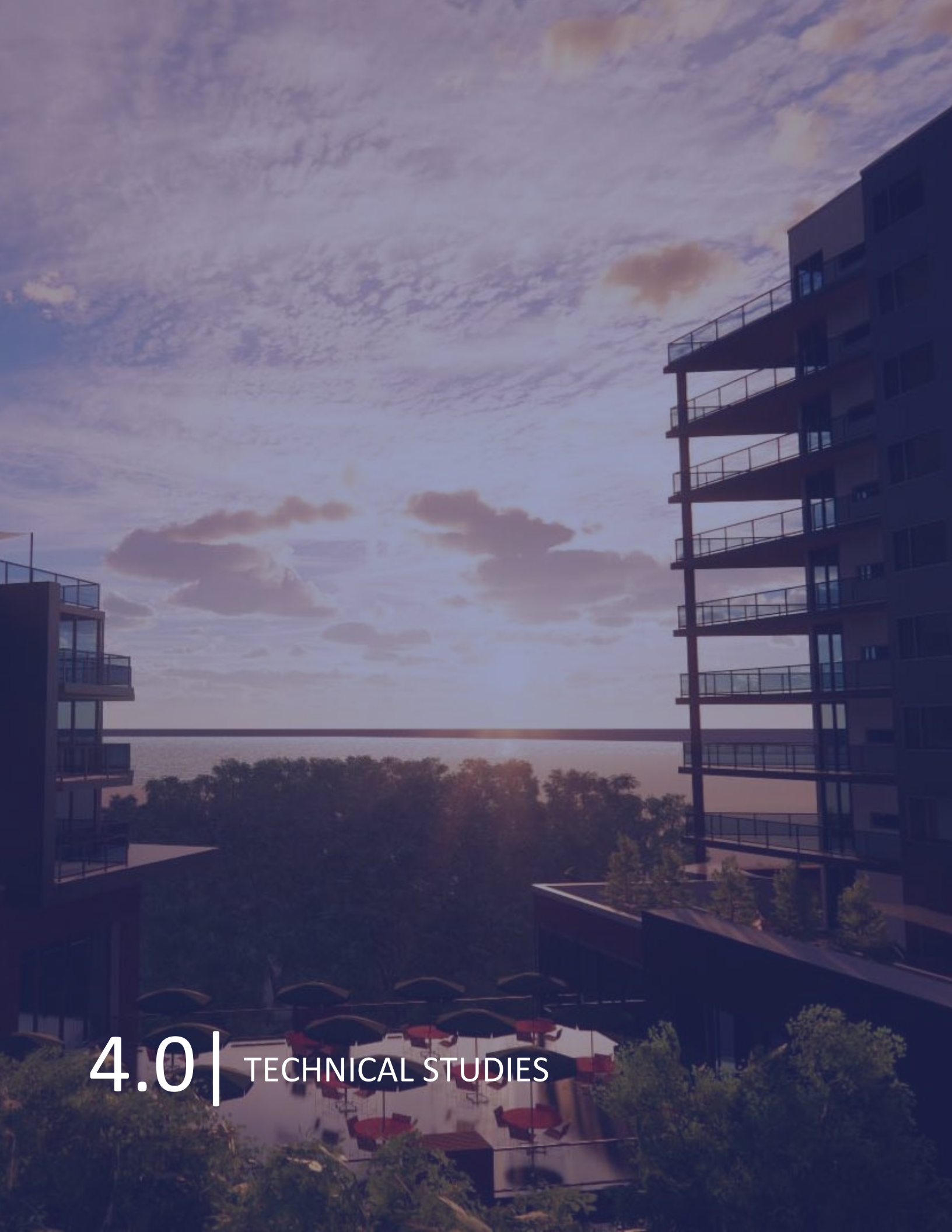


Figure 24: Concept Pla



4.0 | TECHNICAL STUDIES

4.0 TECHNICAL STUDIES

The following technical studies and documents were prepared in support of the applications and include information that was identified by the City as being required on the pre-consultation understanding document (CGS File #: PC2021-073) and from feedback provided at the City's SPART meeting on September 8, 2021.

- Architectural Drawings and Renderings by ACK Architects (dated June 19th, 2023):
 - A1, EL.1, EL.2, EL.3, EL.3b, EL.4, EL.5, EL.6, EL.7
 - SP1, SP1.1, UG1, UG2
 - A1.1, A1.2, A1.3, A1.4, A1.5
 - A2.1, A2.2, A2.3, A2.4, A2.5, A2.6; and,
 - A3.1, A3.2, A3.3, A3.4, A3.5
- Preliminary Pedestrian Level Wind Assessment prepared by Theakston Environmental (dated September 19, 2023)
- Sanitary & Water Capacity Analysis prepared by TULLOCH (dated September 18, 2023)
- Traffic Impact Study prepared by JD Engineering (dated December 23, 2022)
- Sun Shadow Study prepared by ACK Architects

PRELIMINARY PEDESTRIAN LEVEL WIND ASSESSMENT

A *Preliminary Pedestrian Level Wind Assessment* dated September 19th, 2023, was prepared by Theakston Environmental to support the proposed development. The assessment concluded the following:

“With inclusion of the proposed Development, prevailing pedestrian comfort conditions are predicted to remain comfortable and suitable for mainly standing, or better, under normal to high ambient wind conditions. Localised areas proximate to the north and southmost corners of the Development and in the gaps between the buildings will realise windier conditions on occasion. Additional mitigation is recommended for the Main Entrances and Outdoor Amenity Spaces to improve pedestrian comfort conditions and extend the useability of the areas into the shoulder seasons. To the extent mitigation may be warranted is best assessed through quantitative analysis.

The overall upset to pedestrian comfort conditions with inclusion of the proposed Development is well managed by the proposed Development's wind mitigative design features, resulting in conditions that are, in many cases, similar to the existing setting.”

SANITARY & WATER CAPACITY ANALYSIS

TULLOCH Engineering Inc. was retained to evaluate the servicing demand associated with the development of the property located at 700 Paris Street to identify the anticipated servicing demand needed to support the proposed development. The results of the analysis were reviewed by the Development Engineering Section at the City of Greater Sudbury to confirm adequate capacities/flows are available within the existing municipal infrastructure system.

Based on the analysis the City of Greater Sudbury has confirmed that:

- A review of the sewage mains downstream from the proposed connection at MH-MCK-07-09-1122 700 Paris, revealed that the mains are capable of conveying the additional 25.7 L/s of flow expected from the development; and,

- The results of the WaterCAD analysis indicate that sufficient water capacity and pressure exist in order to properly service the development proposal, as presented.

TRAFFIC IMPACT STUDY

A Traffic Impact Study (TIS) dated December 23rd, 2022, was prepared by JD Engineering to assess the impact of traffic related to the development.

The TIS included a of the capacity of the Paris St corridor, including an analysis of the following intersections:

- Paris Street / Brady Street;
- Paris Street / Van Horne Street;
- Paris Street / John Street;
- Paris Street / McNaughton Street;
- Paris Street / Facer Street;
- Facer Street / Bell Park Road;
- Paris Street / Boland Avenue & Paris Driveway;
- Paris Street / York Street; and
- Paris Street / Ramsey Lake Road.

A summary of the conclusions of the TIS– as they relate to the impacts on the proposal on the existing condition of the Paris St corridor - is as follows:

- *The proposed development is expected to generate a total of 202 AM and 206 PM peak hour primary trips and 18 PM peak hour pass-by trips;*
- *Background traffic and pedestrian counts were commissioned for the existing intersections of Paris Street / Van Horne Street, Paris Street / McNaughton Street, Paris Street / Facer Street, Facer Street / Bell Park Road and Paris Street / York Street and were completed on Wednesday, April 20th, 2022. Background traffic and pedestrian counts at the study area intersections were also obtained from the City; and,*
- *An intersection operation analysis was completed at the study area intersections, using the existing (2022) and background (2027 & 2032) traffic volumes, with the adjacent development traffic. This enabled a review of existing and future traffic deficiencies that would be present without the influence of the proposed development. These improvements are warranted based on the anticipated growth in the city and traffic generated by future developments in the study area without the proposed development. The following improvements are recommended.*

Existing (2022) Traffic Volumes

- **Paris Street / John Street and Paris Street / Ramsey Lake Road**
 - Optimize signal timing plan.

Background (2027) Traffic Volume

- **Paris Street / Van Horne Street, Paris Street / McNaughton Street, Paris Street / Boland Avenue & Paris Driveway and Paris Street / York Street**
 - Optimize signal timing plan.

Background (2032) Traffic Volumes

- **Paris Street / Brady Street**
 - Adjust eastbound pavement markings to accommodate a double left-turn lane.
 - Adjust eastbound signal heads to accommodate a protected eastbound left-turn phase.
 - Optimize signal timing plan.
- **Paris Street / Ramsey Lake Road**
 - Widen Ramsey Lake Road to accommodate westbound double right-turn lane with a 100-metre storage length and 60 metre taper length.
 - Optimize signal timing plan.
- An estimate of the amount of traffic that would be generated by the Subject Site was prepared and assigned to the study area streets and intersections.
- An intersection operation analysis was completed under total (2027 & 2032) traffic volumes with the proposed development operational at the study area intersections. The following improvements are recommended prior to build-out of the proposed development.

Opening Day (2027) Traffic Volumes

- **Paris Street / Boland Avenue & Paris Driveway**
 - Shift the Paris Driveway to align with Boland Avenue.
 - The westbound configuration of Paris Driveway at the intersection shall include a left turn lane and through-right lane.
- **Facer Street**
 - Construct sidewalk on the south side of the road between Paris Street and Bell Park Road.
- **Bell Park Road**
 - Reconstruct Bell Park Road south of Facer Street to a 6.0-metre-wide paved condominium road.
 - Bell Park Road shall have a posted speed limit of 20 km/h once Bell Park Road is reconstructed.
- The proposed development will shift the location of the Paris Driveway slightly further north at the intersection to align with Boland Avenue. It is recommended the westbound lane configuration at the Paris Street / Boland Avenue & Paris Driveway intersection include a left turn lane and through-right lane. A single ingress and egress lane at the Paris Driveway will provide the necessary capacity to service the proposed development. The Paris Driveway will provide ingress and egress access to the underground parking and surface parking.
- The Bell Park Access will operate as full-movement access driveway. A single ingress and egress lane at the Bell Park Access will provide the necessary capacity to service the proposed development. The Bell Park Ingress will operate efficiently with a single ingress only driveway. A single ingress lane at the Bell Park Ingress will provide the necessary capacity to service the proposed development. Bell Park Access will provide ingress and egress access to the surface parking and the Bell Park Ingress will provide ingress only access to the underground parking.
- There are no issues regarding the sight distance available for the proposed Paris Driveway and Bell Park Access.
- The proposed parking supply for the proposed development meets the minimum parking requirement specified in the City's Zoning By-law 2010-100Z.

- *In summary the proposed development will not cause any operational issues and will not add significant delay or congestion to the local roadway network.*

TRAFFIC DEMAND MANAGEMENT

As noted in Section 3.4 and 5.2 of the TIS, the traffic volumes along Paris Street in the study area are reaching overcapacity thresholds and further widening of the road itself is not feasible. It is recommended that the City implement TDM measures to reduce the number of residents relying upon single-occupancy vehicles and to improve the accessibility of transit and non-automotive modes of transportation. The following TDM measures are recommended as part of the proposed development:

- *Construct sidewalk on the south side of Facer Street extending from Facer Street to Bell Park Road;*
- *The proposed development includes an internal sidewalk network with pedestrian connections to the proposed sidewalk on Facer Street and the existing municipal pedestrian infrastructure on Paris Street;*
- *The proposed development includes 227 bicycle parking spaces;*
- *An information display board will be provided in a central location in the apartment buildings to display travel information such as bicycle maps, local transit map/schedule and other relevant information;*
- *Information packages will be distributed to new residents including transit and cycling maps; and*
- *Subsidized transit passes be provided to residents.*

SUN SHADOW ANALYSIS

ACK Architects Studio Inc was retained to provide a Sun Shadow Analysis, which assessed the impact of the proposed developments height, mass, and location of shadows cast on adjacent residential areas, public sidewalks, and surrounding parklands.

The City's pre-consultation understanding required that the Sun Shadow Analysis tests be done for March 21 and September 21 between the hours of 9:00AM and 6:00PM and include the identification of permanently shaded areas between the start of December to the end of February.

The Sun Shadow Analysis also included an analysis of the existing sun shadowing that would result from the existing in-force "R4(3)" zoning permissions, to show the difference between existing permission shadowing conditions and proposed development shadowing conditions.

Given the sun shadow renderings it can be concluded that the:

- Majority of the proposed building's sun shadowing is contained within the subject site and municipal right-of-way during the late morning and early afternoon;
- There is an increase in shadowing over portions of Bell Park and Ramsey Lake in late afternoon and evening primarily caused by the addition of the 109-guest room retirement home and an increase in shadowing over single-detached dwellings along Boland Avenue and adjacent open space areas caused by the additional height and 109-guest room retirement home during the morning hours; and
- Year-round a sun-shadow would be observed over the entrances to each of the proposed buildings.



5.0 | POLICY OVERVIEW & ANALYSIS

5.0 POLICY OVERVIEW AND ANALYSIS

The following section sets out the relevant land use planning policy framework to assess the appropriateness of the development proposal within the context of applicable provincial and municipal policies and regulations. Each sub-section outlines relevant policies and provide a land use planning analysis with respect to how the proposed Official Plan and Zoning By-law Amendments are consistent with or conforms to such policies.

PROVINCIAL POLICY STATEMENT (PPS)

The *2020 Provincial Policy Statement (PPS)* provides a high-level provincial land use policy direction for planning approval authorities to consider in preparing municipal land use planning documents, and in making decisions on applications under the *Planning Act*. Those policies applicable to the proposed Official Plan and Zoning By-law Amendments are outlined and discussed below.

Section 1.0 of the PPS speaks to managing and directing land use to achieve efficient and resilient development and land use patterns. **Section 1.1.1** states, in part:

- 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;*
 - c) avoiding development and land use patterns which may cause environmental or public health and safety concerns;*
 - 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*
 - i) preparing for the regional and local impacts of a changing climate.*

RESPONSE

The proposed development promotes efficient development and land use patterns by proposing high density residential land uses on a site well suited for such. The subject site is fully serviced by municipal water and sanitary sewer infrastructure with available capacity to support a density of 237-units per hectare and as such the development proposal makes better use of the existing available services thereby promoting the financial wellbeing of both the City and the Province.

Under **Section 1.1.1** of the PPS, municipalities shall accommodate an appropriate range and mix of residential uses to meet long-term needs, including housing for older persons. The development proposal supports **Section 1.1.1(b) & (f)** by permitting additional multi-unit housing options to the community and supporting a mix of residential housing types and tenures through the addition of retirement guest rooms, freehold condominium units and rental apartment dwelling units that contributes positively toward meeting the needs of changing demographics, while being cognisant of building massing, and appropriate landscaping to mitigate impacts between the development and surrounding urban residential neighbourhood.

The development of a range of housing types to meet long term needs is consistent with the intent of **Section 1.1.1(b)**. Similarly, the mix of housing forms are conducive to the needs of older adult than traditional single detached dwellings and will act to support accessibility with older persons and those with mobility constraints.

The development proposal is also consistent with **Section 1.1.1(e)** through 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 cost given that it provides for residential intensification of an underutilized site along a primary arterial within walking distance to the Downtown.

Section 1.1.3 of the PPS states that Settlement Areas shall be the focus of growth and development and their vitality and regeneration shall be promoted. Given that the subject site is located within the Sudbury Settlement Area, the following policies are applicable:

1.1.3.1 *Settlement areas shall be the focus of growth and development.*

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;

c) minimize negative impacts to air quality and climate change, and promote energy efficiency;

d) prepare for the impacts of a changing climate;

e) support active transportation;

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

1.1.3.3 *Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs*

- 1.1.3.4** *Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.*
- 1.1.3.5** *Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions. However, where provincial targets are established through provincial plans, the provincial target shall represent the minimum target for affected areas..*
-

RESPONSE

The subject site is located within the City's identified settlement area boundary, which under **Section 1.1.3.1** shall be the focus of growth and development. Per **Section 1.1.3.2** the proposed development promotes growth and a mix of uses and densities within Sudbury's existing settlement area, which is suitable for and effectively uses existing municipal infrastructure, public service facilities and incorporates a mix of housing types and tenures in an area predominated by single-detached dwellings and parkland. Further, the development proposal represents the efficient use of land, infrastructure, and resources, given residential uses in this location would better utilize existing established soft and hard municipal services at the proposed density of 237-dwelling units per hectare.

The development appropriately locates a high-density residential use in a location which is adequately set back from existing adjacent low density urban residential development, in order to mitigate sun-shadowing and other impacts on neighbouring uses. The proposed transition in height as one moves inward to the centre of the subject site is a key design element to mitigate such impacts.

The development proposal is further consistent with **Section 1.1.3.3** of the PPS given that the redevelopment of the subject site will accommodate a range of housing built-forms and will serve to support the nearby GOVA transit system as well as nearby active transportation routes. The proposed development can also be supported by existing and planned public service facilities. Per **Section 1.1.3.4** of the PPS, the amending zoning by-law to facilitate the development proposal will also be utilized to establish appropriate development standards that balances the needs and demands for residential intensification within existing settlement areas within the context of the existing surrounding neighbourhood. Per **Section 1.1.3.5** of the PPS, the development proposal would also contribute positively to meeting the intensification target identified in the City's Official Plan of accommodating 20% of its future residential growth within the built-up area.

Section 1.3 of the PPS outlines policies related to employment. The following policies are relevant to the applications:

- 1.3.1** *Planning authorities shall promote economic development and competitiveness by:*
- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
 - b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses; and,*
 - d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4.*

RESPONSE

The proposed development offers a compact development that incorporates a contextually-sensitive and appropriate ancillary employment generating uses (i.e. restaurant and retirement home) that are compatible with the existing neighbourhood, the proposed residential uses and the subject site's proximity to Sudbury's urban waterfront. These new business and employment opportunities are consistent with the PPS's intent of building liveable and resilient communities and promoting economic development and competitiveness, given the resulting ability for future residents to live, work, and play within this neighbourhood and/or have appropriate access to other areas of Sudbury that also provide such opportunity.

Section 1.4 of the PPS outlines policies associated with housing and states that:

- 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;**
 - 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.*
-

RESPONSE

The proposed development represents residential intensification that is appropriate and serves to direct growth to lands situated within the City's settlement boundary. Further to **Section 1.4.3**, the development proposal will aid in providing an appropriate and varied mix of housing tenure to the area through the addition of rental and freehold multi-unit housing and retirement home guest rooms. The development will propose to:

- Provide for a transit-supportive residential density that will be compact in form and represents an efficient use of land and resources including the use of existing and planned nearby transit (i.e. GOVA).
 - Assist in meeting the social, health, economic and well-being of current and future residents and respond to demographic changes through the addition of varied housing tenures and types (i.e., retirement guest suites, apartment units, and freehold condominium units).
 - Introduces a retirement home use to the neighbourhood in order to accommodate the housing needs of Sudbury's aging population and allow for aging in proximity to transit, amenities and active park spaces.
 - Provide high density residential intensification at a scale that is respectful of the existing residential neighbourhood by using setbacks, landscape buffering and placement of the buildings closer to the easterly and southerly lot lines while still building upon and leveraging the central location, and historic use as a regional draw/community facility (Sudbury General Hospital).
 - Assist the City of Greater Sudbury in meeting its municipal housing target of creating 3,800 more homes by 2031 via contributing 421 those units in addition to 109 retirement guest suites.
 - Direct high density/new housing development to a location that efficiently uses land, infrastructure, and public service facilities given that the subject site is fully serviced with municipal infrastructure that has sufficient servicing capacity available.
-

Section 1.5 of the PPS outlines policies regarding public spaces, recreation, parks, trails, and open space. The following policies are relevant to the application:

1.5.1 *Healthy, active communities should be promoted by:*

- a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
 - b) planning and providing for a full range and equitable distribution of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources; and,*
 - c) providing opportunities for public access to shorelines.*
-

RESPONSE

The proposed development promotes healthy and active communities given its location and the significant enhancements to the public realm and streetscapes along both Paris Street and Facer Street. The proposed enhancements serve to assist in creating a safer and more pedestrian-friendly environment by providing an internal pedestrian circulation network that is well connected externally to the site.

The subject site is also well-connected to many publicly accessible built and natural settings for recreation, including facilities, parks and open spaces that are supportive of the principles of healthy community planning. Specifically, the site directly abuts Bell Park, which features a range of recreational opportunities including trails, the Ramsey Lake Boardwalk, Bell Park beach, programmable outdoor recreational space (i.e. Splash N Go Adventure Park, community/private events

etc.), playgrounds, outdoor workout equipment, the Bell Park Skating Path during the winter months and the other waterfront-related recreational activities that foster social interaction.

Section 1.6.6 of the PPS addresses the provision of sewage, water and stormwater infrastructure, and states in part that:

1.6.6.1 *Planning for sewage and water services shall:*

a) *accommodate forecasted growth in a manner that promotes the efficient use and optimization of existing:*

1. municipal sewage services and municipal water services;

b) *ensure that these systems are provided in a manner that:*

1. can be sustained by the water resources upon which such services rely;

2. prepares for the impacts of a changing climate;

3. is feasible and financially viable over their lifecycle;

c) *promote water conservation and water use efficiency; and,*

d) *integrate servicing and land use considerations at all stages of the planning process.*

1.6.6.2 *Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support protection of the environment and minimize potential risks to human health and safety. Within settlement areas with existing municipal sewage services and municipal water services, intensification and redevelopment shall be promoted wherever feasible to optimize the use of the services.*

1.6.6.7 *Planning for stormwater management shall:*

a) *be integrated with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*

c) *minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*

d) *mitigate risks to human health, safety, property and the environment;*

e) *maximize the extent and function of vegetative and pervious surfaces; and,*

f) *promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development.*

RESPONSE

The development proposal is consistent with **Section 1.6.6** of the PPS as it promotes the efficient use of existing municipal infrastructure and provides new housing options in a location which does not require the extension of municipal infrastructure. The proposed development will be connected to full municipal water and sanitary sewer infrastructure

along Paris Street, which is the preferred method of servicing the City's settlement areas. Sufficient sewer and water capacity to support the proposed development has also been confirmed by the City's Development Engineering Section.

Site plan control will require a comprehensive stormwater management approach to address the quality and quantity of stormwater. The proposed underground parking structure has significantly reduced the amount of surface parking (and road salt and snow storage required to maintain large surface parking areas) thus leading to better stormwater management and lake quality outcomes.

The PPS also provides policy direction for matters related to transportation in **Section 1.6.7**. The 2020 PPS states that:

- 1.6.7.1** *Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.*
- 1.6.7.2** *Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible.*
- 1.6.7.4** *A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.*

RESPONSE

Locating a mix of uses and higher density housing along arterial roads is encouraged as it supports feasibility of transit services, which increases ridership/utilization of a public investment, alleviates traffic congestion, and reduces reliance on the automobile. The proposed residential and limited restaurant uses will have direct access to the GOVA public transit system and nearby active transportation networks, thereby encouraging the use of public transit per **1.6.7.4** of the PPS. The subject site is also optimally connected to the Downtown via public transit service, thereby reducing the need for personal vehicle usage as per **1.6.7.4** of the PPS. The housing mix and densities along with their proximity to transit and future bike lanes on Paris Street will also assist in reducing the number of vehicle trips and will support alternative transportation methods.

The Traffic Impact Study concluded that, "... *the proposed development will not cause any operational issues and will not add significant delay or congestion to the local roadway network.*", thus responding to PPS policy **1.6.7** that requires transportation systems provide the safe movement of people and goods. Transportation Demand Management (TDM) considerations were also included with the TIS, which detail several TDM initiatives that will reduce automobile travel demand from the development.

Section 1.7 of the PPS provides a policy direction for municipalities to pursue and achieve long-term economic prosperity. The following policies are relevant:

- 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;*
- d) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;*
- 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*

RESPONSE

The proposed development will support long-term economic prosperity through the redevelopment of an underutilized site to provide the opportunity for new housing (i.e. 530-units), businesses and public realm enhancements that will create a sense of place and bring vitality to the site. The applications are consistent with **1.7.1(a)** as they enable an opportunity for economic development (and respond directly to a community investment opportunity).

The applications encourage residential uses which respond to market-based housing needs (i.e. more affordable housing options and changing demographics) and aid in providing necessary housing supply and a range of housing options through the addition of rental apartments, freehold condominiums and retirement home guest rooms in the City per **1.7.1(b)**. The proposed residential built-form has been designed to mitigate impact to the neighbourhood and complement the adjacent parklands via landscaping, setbacks, careful massing, and the buffering provided via increased setbacks and the Facer Street right-of-way.

Section 1.8 of the PPS speaks to energy conservation, air quality and climate change. It states in part:

- 1.8.1** *Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and preparing for the impacts of changing climate through land use and development patterns which:*
- a) promote compact form and a structure of nodes and corridors;*
 - b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas;*
 - e) encourage transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion;*
 - g) maximize vegetation within settlement areas, where feasible.*

RESPONSE

The proposed development enables transit-supportive intensification and improves the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion via the site's connectivity and location.

The proposed development will support improved air quality, reduced greenhouse emissions and respond to the impacts of climate change by promoting the use of active transportation and transit for new residents, as the development is located adjacent to existing public transit routes and active transportation options.

The new sidewalks and future bicycle lanes proposed along Paris Street will further enhance active transportation and safety as it relates to accessing the transit system.

Section 2.2.1 provides a policy direction respecting the quantity and quality of water resources and states in part:

- 2.2.1** *Planning authorities shall protect, improve or restore the quality and quantity of water by:*
- f) implementing necessary restrictions on development and site alteration to:*
- 1. protect all municipal drinking water supplies and designated vulnerable areas; and,*
 - 2. protect, improve or restore vulnerable surface and ground water, sensitive surface water features and sensitive ground water features, and their hydrologic functions*

RESPONSE

Per **Section 2.2.1** of the PPS, the subject site is located within the Ramsey Lake Intake Protection Zone 1 and 2 Area and has a vulnerability score of 10. It is noted that in such areas the preparation of a Risk Management Plan may be required to address the ‘significant threat activities’ that are associated with the application of road salt and the storage of snow if the exterior parking lot is equal to or greater than 1 hectare in area. The handling and storage of road salt (i.e. 0.5 tonnes or greater) is prohibited. The proposed underground parking structure has significantly eliminated the amount of surface parking required to service the proposed housing units, which would otherwise require significant road salt and snow storage. The proposed at-grade parking spaces do not have a total area greater than one hectare and therefore a Risk Management Plan is not required. A *Section 59 Source Water Protection Application* will be submitted as part of the Official Plan and Zoning By-law Amendment applications.

PPS SUMMARY

The proposed development and its implementing Official Plan and Zoning By-law Amendments are consistent with the 2020 Provincial Policy Statement. The proposed development provides a compact urban development which more efficiently uses land and existing municipal services and infrastructure along a primary arterial road adjacent to existing public transit routes.

The provision of a total of 530-residential units will serve to diversify the supply of housing in the City, support housing affordability, provide housing choices that respond to market demands and facilitate the creation of housing options for Sudbury’s aging demographic and smaller household sizes.

The subject lands connectivity to the Downtown, and broader City allows its residents to have easy access to employment centres, public service facilities and commercial centres. The proposal also supports and provides future residents access to parks and open space amenities supporting healthy living. Moreover, the introduction of contextually appropriate commercial (restaurant) use to this area will aid in building liveable and resilient communities, given the resulting ability for future residents to live, work, and play within their neighbourhood.

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:

- 3.4.3** *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.*

RESPONSE

Per **Section 3.4.3** the development proposal introduces a further range of housing types in the community by increasing freehold and rental housing stock and introducing a more diverse urban residential built form in an appropriate location. The development also introduces a limited amount of non-residential use (i.e. restaurant) that aims to contribute to a healthy and high-quality urban space. Further, the proposed development is appropriate given that the lands are located adjacent to public open space (Bell Park) and will contribute to the park's usage.

The site's connectivity to the City's Downtown, South End, and broader City via active transportation, transit, and other mobility means, allows for easy access to stores and services.

Section 4.3 of the GPNO provides that economic and service hubs such as the City of Greater Sudbury shall develop strategies for developing a diverse mix of land uses and encouraging future residential development in certain areas.

Section 4.4 speaks to the City of Greater Sudbury as a municipality with strategic core areas.

The GPNO states in part that:

- 4.4.2** *Municipalities that contain strategic core areas are encouraged to plan for these areas to function as vibrant, walkable, mixed-use districts that can:*
- a.** *attract employment uses and clusters, including office and retail*
 - b.** *accommodate higher densities*
 - c.** *provide a broad range of amenities accessible to residents and visitors including vibrant streetscapes, shopping, entertainment, transportation connections, lodging, and educational, health, social and cultural services.*

RESPONSE

Intensification Corridors are defined in the GPNO as: *Areas along major roads, arterials or transit corridors that have the potential to provide a focus for higher density mixed-use development.* Per **Section 4.3.3** the development proposal will

add to the range of housing types available in this core area, as it is designated as a Primary Arterial Road in the City's Official Plan with transit and has the potential to accommodate higher density mixed use developments.

The development of high-density residential uses in this location will help promote a vibrant, walkable, mixed-use area which is near the Downtown and its shopping, entertainment, transportation connections, educational, services, and other health, social, and cultural service amenities.

CITY OF GREATER SUDBURY STRATEGIC PLAN

The City of Greater Sudbury's Strategic Plan was updated in 2023. It states that *'the City of Greater Sudbury operates approximately 60 lines of service...The plan highlights the changes City Council wants to make, which it believes are fundamentally important for the community's sustainability, economic competitiveness, and quality of life'*.

The development proposal assists in contributing positively to the strategic directions endorsed by City Council. Specifically, it aligns with the Strategic Plans objectives and goals **2.4, 3.2, 4.1, 4.3, 5.5** and **5.6**.

STRATEGIC INITIATIVE 3.2

Complete and implement Community Energy and Emissions Plan that will provide guidance to reduce greenhouse gas emissions.

RESPONSE

The proposed development assists with achieving Goals 1, 2, and 7 of the CEEP as outlined later in this report through promoting the use of active transportation and facilitating compact infill development with varied housing tenure.

STRATEGIC INITIATIVE 4.1

Evaluate potential to partner with private sector developers through CIPs or directly to increase or accelerate mixed use rental housing projects

STRATEGIC INITIATIVE 4.3

Improve services/housing for all those living or seeking to live in Greater Sudbury

RESPONSE

The proposed development will be eligible for, and benefit from the City's Strategic Core Areas CIP which has been recently amended to encourage multi-residential development along the City's Strategic Corridors (including Paris Street).

The proposed development supports housing for all those living or seeking to live in Greater Sudbury via developing a range of housing types and tenures - including a retirement residence - along a major transportation corridor and near Sudbury's Downtown.

STRATEGIC INITIATIVE 5.5

Support a local culture of embracing the different lifestyles available (urban, suburban and rural) that make up Greater Sudbury

Examine options for appropriate commercial development in Bell Park and around Ramsey Lake

RESPONSE

The proposed development supports urban living by establishing high density residential uses near the heart of the City, and adjacent to Bell Park and its numerous cultural and lifestyle amenities.

Modern waterfront development settings often promote the establishment of mixed-use communities that allow for non-residential development, such as restaurant and dining opportunities, as a means of tourism support, economic development and cultivating vibrant public spaces. The development introduces restaurant uses which are appropriate and compatible with both the proposal and the surrounding area and represents an appropriate commercial development per Strategic Initiative **5.5**.

CITY OF GREATER SUDBURY OFFICIAL PLAN

The *City of Greater Sudbury's Official Plan* is the principal and guiding land use planning policy document for the City of Greater Sudbury. The City's Official Plan (OP) establishes objectives and policies that guide both public and private development/decision-making. The subject site is designated 'Living Area 1' per *Schedule 1B* of the City's OP. The lands are also located within the 'Settlement Area' and 'Built Boundary' on *Schedule 3* of the City's OP.

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

- 2.3.2.1** *Future growth and development will be focused in the Settlement Area through intensification, redevelopment and, if necessary, development in designated growth areas.*
- 2.3.2.2** *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.*
- 2.3.2.3** *Intensification and development within the Built Boundary is encouraged in accordance with the policies of this Plan. Development outside of the Built Boundary may be considered in accordance with the policies of this Plan.*

RESPONSE

Per **Sections 2.3.2.1** and **2.3.2.3** the subject site is located within the City's built boundary and settlement area which is intended to accommodate the focus of intensification, future growth, and development in the City. With respect to **Section 2.3.2.2**, it is noted that the development represents the efficient use of land, infrastructure and public service facilities, and will support the public transit system and active transportation options and in doing so will aid in minimizing impacts on air quality.

Section 2.3.3 addresses intensification and states in-part:

- 2.3.3.1** *All forms of intensification are encouraged in accordance with the policies of this Plan.*
- 2.3.3.2** *The City will aim to accommodate 20 percent of future residential growth and development through intensification within the Built Boundary.*
- 2.3.3.3** *Large scale intensification and development is permitted in strategic core areas such as the Downtown, Regional Centres and major public institutions, in accordance with the policies of this Plan.*
- 2.3.3.5** *Intensification and development is permitted in established Living Area I lands, in accordance with the policies of this Plan.*
- 2.3.3.6** *Intensification will be encouraged on sites that are no longer viable for the purpose for which they were intended such as former commercial, industrial and institutional sites. It will also be encouraged where the present use is maintained but the addition of residential uses can be added in a complementary manner.*

- 2.3.3.7** *Intensification will be encouraged on sites with suitable existing or planned infrastructure and public service facilities.*
- 2.3.3.8** *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.*
- 2.3.3.9** *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.*
- 2.3.3.10** *Residential intensification proposals will be assessed so that the concerns of the community and the need to provide opportunities for residential intensification are balanced.*

RESPONSE

Per **Sections 2.3.3.5** and **2.3.3.6**, the lands are located within the Living Area 1 designation. The proposed addition of 530-units (including retirement residence) assist in meeting the City’s target of accommodating 20% of future residential growth and development through intensification within the City’s built boundary. Further, the development proposes to introduce 421 of the 3800 homes that the City has committed to achieving by 2031.

Section 2.3.3.9 of the Official Plan sets out the criteria for evaluating whether a location is appropriate for intensification. The development proposal is an appropriate location for high density intensification given its location, sufficient

infrastructure and services, availability of transit and active transportation, proximity to the City's largest urban park, and appropriate compatibility mitigation measures (i.e., buffering, below grade parking, landscaping, and setbacks) provided.

Specifically, the development meets the intensification criteria and proposes appropriate high-density infill given:

- The site has a shape, size, and topography that is appropriate to accommodate a high-density residential use given:
 - The site has a large area and significant frontage (± 1.78 hectares with ± 233.0 metres of frontage) to accommodate appropriate landscaping, outdoor amenity space, and parking.
 - The ability to utilize the site's topography to locate the 3-storey parking garage below grade thereby allowing for ground-oriented uses to activate the site's Paris and Facer Street frontage and reducing impervious surfaces resulting from large at-grade parking lots.
- The proposed buildings will have heights of 12-storeys, 20-storeys and 16-storeys from the north of the site to the south respectively. Setbacks and building step-backs have been provided to aid in reducing the impacts of the proposed development on surrounding low density residential uses while enabling an appropriate level of intensification given the site's location.
- The development will provide and, in many areas, exceed the minimum 3.0-metre-wide landscaping strip requirements of the City's Zoning By-law. Landscaping along the frontage will be improved from its existing condition with the addition of new landscaped open space, tree planting and pedestrian linkages to the City's transit and active transportation systems.
- The site will be fully serviced and efficiently using existing municipal infrastructure. Preliminary servicing information indicates that no extension of services is required and no upgrades to sewer and water servicing are required for the development. The City's Development Engineering Section has confirmed that there is sufficient domestic water pressure, and that the downstream sanitary sewer system has sufficient capacity to accommodate the proposed redevelopment.
- The development will provide all required parking and loading per zoning requirements and no site-specific relief from such are required to accommodate the land uses proposed.
- The TIS concluded that the proposed development will not cause any operational issues and will not add significant delay or congestion to the local roadway network;
- The development of the site will contribute to increased transit ridership and active transportation use in the area, all of which is sited and available near trails, schools and the Downtown and is well connected to the broader City of Greater Sudbury.
- The development is setback and screened by existing mature vegetation from the main recreational trails/areas along Bell Park's waterfront and therefore the increased height/density's impact to Bell Park's natural and cultural resources are being mitigated. The increase in residents living in proximity to the park should increase the usage of both the park and attendance at its numerous cultural and recreational events;
- There will be an increase in sun-shadowing caused by the three buildings from what the present zoning permissions allow as described in Section 4.0 of this Report;
- The Preliminary Wind Assessment determined that any upset to pedestrian comfort conditions is within a normal range and will be well managed by the proposed development's wind mitigative design features and no impacts are anticipated.
- No natural features or cultural heritage resources have been identified on the subject site; and
- No natural or man-made hazards such as floodplains have been identified on the subject site.

With respect to **Section 2.3.3.8** and **2.3.3.10** of the City's Official Plan, the design, density and layout of the proposed development responds to potential compatibility concerns by physically separating but socially integrating the existing neighbourhood. The building closest to the neighbouring properties on Facer Street is limited to 12-storeys with the 16 and 20-storey buildings being located closer to the interior/southerly portion of the site. The proposed development also incorporates landscaped open space to lessen the impact of the three proposed buildings. Improvements to the landscaping and parking areas in the front and corner yard will enhance the appearance of the subject site from Facer Street and Paris Street as well as from other nearby properties.

The condominium, apartment and retirement guest room units will assist the City in meeting the current and future demand for these type of residential dwelling units, in an appropriate location.

Section 3.2 outlines general policies for Living Areas.

3.2.2 *Medium density housing is permitted in all Living Area I designations where full municipal services are available. High density housing is permitted only in the community of Sudbury.*

3.2.3 *New residential development must be compatible with the existing physical character of established neighbourhoods, with consideration given to the size and configuration of lots, predominant built form, building setbacks, building heights and other provisions applied to nearby properties under the Zoning Bylaw.*

3.2.9 *Small-scale commercial uses that are intended to serve the convenience needs of local residents are permitted in all Living Areas by rezoning. Such uses are intended to be isolated rather than forming a group or cluster that could potentially change the residential character of an area. These uses, which may include confectionary stores, laundromats, and other personal service establishments, are limited to a maximum of 150 m² of floor space per location. Zoning applications for local commercial uses will be reviewed on the basis of general conformity with the following policies:*

a. access to and traffic generated by the site will not create adverse traffic problems on surrounding roads;

b. lighting and signage are located so as not to create any adverse visual impact on the surrounding residences;

c. the use will provide landscaping and buffering in a manner that is in harmony with adjoining and nearby residential properties; and,

d. the proposed small-scale commercial use must form a good fit with the existing neighbourhood fabric.

RESPONSE

As stated above the building closest to the neighbouring properties on Facer Street is limited to 12-storeys with the 16 and 20-storey buildings being located closer to the interior/southerly portion of the site. The proposed development also incorporates landscaped open space to lessen the impact of the three proposed buildings.

A public restaurant is proposed on the 20th floor of Building B. The development proposal also includes ±85.0m² of public restaurant space on the ground floor of Building C, which is anticipated to take the form of a small café/restaurant.

The introduction of such restaurant uses is considered limited, appropriate and compatible given the availability of sufficient parking and public transit to the site, the location of the commercial uses on the site, and the site's proximity to Bell Park and Ramsey Lake. Further, **Section 5.5** of the City's Strategic Plan requests that the City '*examine options for appropriate commercial development in Bell Park and around Ramsey Lake*'. The proposal incorporates small scale, commercial uses (consistent with the intent of OP 3.2.9 policy) with the Strategic Plans desire to explore appropriate waterfront-related commercial uses. This demonstrates that the proposed limited commercial use aligns with the intent of the Strategic Plan.

Section 3.2.1 establishes more detailed policies in the Living Area 1 land use designation:

3.2.1.3 *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.*

3.2.1.4 *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.*

3.2.1.5 *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.*

3.2.1.6 *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.*

Applications for intensification in established Living Area I lands are also subject to Section 2.3.3.

RESPONSE

The proposed development conforms to policies under **Section 3.2.1** of the OP by delivering a mixed-use development which is in close proximity to arterial roads, has the benefit of public transit at its frontage, and is well connected to main employment, commercial, and open space areas.

The proposed high-density housing is located in an area with adequate servicing capacity and the Traffic Impact Study concluded that the proposed development will not cause any operational issues and will not add significant delay or congestion to the local roadway network.

The 1.78-hectare site will allow for extensive landscaped open spaces and amenity areas with approximately 43.2% of the subject site proposed to be landscaped, which will be detailed (along with on-site lighting) through the required site plan control agreement. As discussed previously the proposed development massing, siting, and setbacks are cognizant of the surrounding context.

Section 8.3 addresses Source Water Protection Areas, intended to protect the City’s municipal drinking water sources. The policies in the Section state in part:

- 8.3.1** *Development, certain land use activities and public works within the vulnerable areas will conform with the policies on List A of the Greater Sudbury Source Protection Plan.*

RESPONSE

With respect to **Section 8.3**, the proposed use of the lands does not present any conformity issues with the City’s Official Plan as the proposed development does not include any significant threats as set out in the City’s Source Protection Plan which is reviewed later in this report.

Section 11.3.2 outlines land use policies that are intended to support public transit needs and options. Applicable policies to the development proposal includes:

- 11.3.2.1** *Urban design and community development that facilitate the provision of public transit will be promoted.*
- 11.3.2.2** *Development proposals will be reviewed to ensure efficient transit routing so that all dwellings in the development are ideally within 500 metres walking distance of a bus stop.*
- 11.3.2.3** *Mixed uses and higher density housing along Arterial Roads and at other strategic locations are encouraged as a means of enhancing the feasibility of transit services, increasing ridership, alleviating traffic congestion, and reducing reliance on the automobile.*
- 11.3.2.4** *Buildings should be sited as close to the street as possible to reduce walking distances for transit users*
- 11.3.2.6** *Pedestrian walkways, intersections of major roads, and pedestrian access systems are to be integrated with transit stops, and wherever possible, connected to trail systems*

RESPONSE

The development proposes a high-density residential/retirement development with scoped commercial uses along a primary arterial road and assists in enhancing the feasibility of transit services, increasing ridership, alleviating traffic congestion, and reducing reliance on the automobile. It does so by being directly adjacent to public transit that is well connected to major community destinations (i.e. the Downtown Transit Hub and points of interest such as Health Sciences North, Laurentian University, and the Larch Street Medical Centre). The development proposal also includes a public transit lay-by along Paris Street with pedestrian connections from all three of the residential buildings to the public right-

of-way. The TIS also proposes TDM measures, such as subsidized transit passes, and the installation of an information display board with bicycle maps, local transit map/schedule and other relevant information, which will aid in encouraging the use of public transit services, alleviating traffic congestion, and reducing reliance on the automobile.

Section 11.4 details policies related to parking and provides in part as follows:

- 11.4.1** *New developments generally must provide an adequate supply of parking to meet anticipated demands.*
-

RESPONSE

The development includes 647-parking spaces with no site-specific parking relief being necessary under the City's Zoning By-law. Given that the development proposes to provide all required parking spaces on-site an adequate supply to meet anticipated demands (pursuant to the By-law anticipated parking needs for each use) is provided.

Section 11.7 speaks to active transportation, the pedestrian and bicycle network and provides in part as follows:

- 11.7.2** *Development proposals will be reviewed to ensure that there is adequate pedestrian access in new developments. The City may acquire lands to provide pedestrian facilities as a condition of approval. Wherever possible, the provision of adequate bicycle facilities will be encouraged.*
-

RESPONSE

The development incorporates streetscape improvements along road frontages and the provision of bicycle parking (in conformity with the zoning by-law's requirements), which complements the existing and planned active transportation infrastructure in this area and will encourage both pedestrian and bicycle active transportation mobility, as well as connectivity to the wider public transit system.

The City's Roads, Transportation and Innovation staff have previously advised that a 3.0-metre road widening is required along Paris Street and that additional lands may be required to construct a new sidewalk, along with the Paris-Notre Dame Bikeway and a GOVA bus lay-by along the property's frontage. The new sidewalk will provide safe and convenient pedestrian access from the development to transit on Paris Street. An on-site pedestrian circulation network will also be designed as part of the site planning process to link the internal pathways and sidewalk network to Paris and Facer Street.

Section 12.2.2, outlines policies related to the servicing of new development.

- 12.2.2.1** *Development in urban areas is permitted provided that existing and planned public sewage and water services have confirmed capacity to accommodate the demands of the proposed development. Alternatively, the proponent of the development will upgrade, at their own expense, the existing sewage and water systems to ensure adequate delivery and treatment facilities consistent with City standards, including the adequacy of fire flows.*
-

RESPONSE

With respect to **Sections 12.2.2.1**, preliminary servicing information indicates that no extension of any municipal services is required and no upgrades to sewer and water infrastructure are required for the development. The City has also confirmed that there is sufficient water pressure and downstream sanitary sewer capacity to accommodate the proposed redevelopment of the subject site.

Section 14.3 addresses policies respecting Community and Neighbourhood design and states in part:

- 14.3.1** *The City will encourage community and neighbourhood design that:*
- a. creates a distinctive community character and strong sense of place;*
 - b. integrates a mix of land uses such as living areas, employment areas, institutional uses and parks and open spaces;*
 - c. fosters active transportation and public transit;*
 - d. incorporates natural and cultural heritage features and areas;*
 - e. provides an interconnected network of parks and open spaces; and,*
 - f. creates accessible, safe, sustainable and climate change resilient places.*
- 14.3.2** *Buildings, structures and other design elements that complement the surrounding built form and character are encouraged.*
- 14.3.4** *Area streetscapes are to be improved over time to provide safe, attractive, interesting and comfortable spaces through appropriate upgrades, such as landscaping, lighting, sidewalks, paving, street furniture and public art. These treatments should complement adjacent built form and open spaces, adding to a neighbourhood's character.*
-

RESPONSE

The intent of **Section 14.3.1** of the OP is to encourage high-quality community and neighbourhood design that creates a distinctive community character, strong sense of place, integrates a mix of land uses, promotes active transportation and public transit, and provides connectivity to parks and open spaces.

This development incorporates architectural design features including tower and podium-style configurations to reduce the visual and physical impact of height through facade articulation and fenestration techniques to mitigate impact to the existing neighbourhood and adjacent urban waterfront park setting. It will also foster a strong sense of place by integrating the development with the broader area through active transportation connections and including community-oriented uses (restaurants) at an appropriate scale. Further the development integrates a mix of land uses (i.e., restaurant, retirement and residential uses), that encourage the integration of private spaces with the existing public realm given the proximity to Bell Park and the café and restaurant use being accessible to the public.

The property's direct connectivity to the GOVA transit system and future Paris-Notre Dame bikeway will encourage the use of both active transportation and public transit with climate change resiliency in mind.

Area streetscapes are proposed to be improved to provide safe, attractive and comfortable spaces through the introduction of appropriate landscaping, lighting and new sidewalks/active transportation infrastructure.

Section 14.4 outlines policies related to site and building design, which states in part:

- 14.4.1** *Development and intensification will be located and organized to fit with its existing or planned context. It will frame and support adjacent streets, parks and open spaces to improve activity, comfort and safety by:*
- a. generally locating buildings parallel to the street or along the edge of a park or open space with a consistent front yard setback. On a corner site, development and intensification should be located along both street frontages and give prominence to the corner. On a site that terminates a street corridor, the development should acknowledge the prominence of that site;*
 - b. massing buildings to define the edges of streets, parks and open spaces in good proportion;*
 - c. creating appropriate transitions in scale to neighbouring existing or planned buildings;*
 - d. locating main building entrances so that they are clearly visible and easily accessible from the public sidewalk;*
 - e. providing ground floor uses that have views into surrounding streets, parks and open spaces; and,*
 - f. minimizing shadowing and uncomfortable wind conditions on surrounding streets, parks and open spaces to preserve their utility.*

RESPONSE

Regarding **14.4.1**, the development will:

- Introduce a café and retirement home in the northerly portion of the site (close to the corner) which will aid in giving prominence on the corner of Paris and Facer Street.
- Locate buildings along the edge of abutting open spaces and provide an appropriate transition in scale to existing buildings.
- Provide ground-floor uses that have views on to surrounding streets and introduce resident views on the park/open space.
- Introduce additional shadowing impact but which preserves the utility of the surrounding streets, parks and open spaces.
- The development proposal intends to provide setbacks along the public boulevard (i.e. Paris Street) that contribute to a desirable streetscape.
- Provide building entrances that will be clearly visible and easily accessible from the public sidewalk.
- Not introduce wind conditions that negatively impact the public realm (surrounding streets, parks and open and their utility).

Section 14.4.2 address the design of vehicle parking, access, service areas and utilities and states:

- 14.4.2** *Development and intensification will locate and organize vehicle parking, vehicular access, service areas and utilities to minimize their impact on the property and on surrounding properties and the public realm by:*
- a. minimizing the number of curb cuts and driveways that cross the public sidewalk;*
 - b. limiting surface parking between the front face of the building and the public street and sidewalk;*
 - c. locating servicing and utilities towards the sides or rear of the building and screening the servicing from views from adjacent streets;*
 - d. integrating servicing and utility functions within the building, where possible; and,*
 - e. providing adequate landscaping and buffering between adjacent properties.*

RESPONSE

The majority of the parking spaces servicing the development will be provided through three levels of underground parking located at the rear of the property and provides an opportunity for utilities and service functions (e.g. loading, etc.) to be appropriately screened from Paris Street. This screening will assist in maintaining a street-facing ground level that enhances the aesthetics and compatibility of the proposed development. The natural vegetative areas between the east property line and those areas of Bell Park more actively used (i.e. directly along the waterfront) will also act to screen the rear parking structure (1-3 storeys) from the most publicly-active areas of the Park.

Per **Section 14.4.2**, only two driveways are proposed to provide access to the site which represents the same number of curb cuts/driveways as the existing condition. The siting of the buildings provides for significant setbacks and areas around the periphery of the site for tree planting between the proposal and adjacent properties.

Section 14.7 of the OP discusses design features, views, and corridors. It states that:

- 14.7.1** *New land uses or design features that would detract from the enhancement of major focal point areas within the City, such as Science North, the Big Nickel, Bell Park, Tom Davies Square and Laurentian University are discouraged. The open space character and natural aesthetic environment of the Paris Street corridor, especially that section between Walford Road and York Street, will be preserved and enhanced. In particular, the view corridor to and from Science North will be protected.*
- 14.7.3** *Landscaping will be used to frame desired views or focal points, direct pedestrian movement, and satisfy functional requirements, such as providing shade and buffering. All new development proposals will be evaluated for their opportunity to create, maximize or enhance existing views through landscaping.*
- 14.7.4** *This Plan encourages the design and layout of streets, pedestrian walkways and bicycle routes such that they provide vantage points for significant views and vistas along their lengths, including trails and bike path*
- 14.7.5** *View corridors to lakes should be preserved.*

RESPONSE

The City's OP identifies the Paris Street corridor, including views to Ramsey Lake, Bell Park, and Downtown as important view corridors. Impacts to views along the corridor and through the development to Ramsey Lake have been mitigated through the use of architectural techniques previously discussed (i.e., setbacks and building separation). Landscaping will be used to frame this stretch of Paris Street, direct pedestrian movement, and re-green this presently barren site to better mirror Bell Park and Paris Street's open space character and natural aesthetic.

Changes to viewpoints/vistas along Paris St will result from the development, however the development's design will maintain views (and in some instances improve such), from the condition the property experienced when it was actively used as a General Hospital (prior-to the demolition of some portions of the former building complex). In some areas, view corridors to the lake will be opened given the three-building configuration, proposed building separation and placement of the parking structure below grade.

Views to and from Downtown along Paris Street will change through the addition of this development. Specifically heading south along Paris Street from the Bridge of Nations where the development will be featured on the horizon and heading north along Paris Street towards Downtown as a landmark. This new land use will not detract from major focal points given its location and will introduce new landscaping to the Paris Street corridor as called for in **14.7**.

Section 14.9 sets out policies respecting energy efficiency and climate change resiliency and states in part:

14.9.1 *The City will encourage urban design solutions that minimize non-renewable resource consumption, maximize the use of renewable energy and takes into account the impact of climate change by:*

a. encouraging compact, mixed use and infill developments that concentrate complementary land uses and support active transportation and public transit.

RESPONSE

With respect to **Section 14.9.1**, as discussed previously the proposed development represents a compact, contextually sensitive mixed-use infill development that will complement and support the existing GOVA transit lines and existing and future active transportation investments in the area.

Section 16.2 of the City's OP promotes policies which plan for and are supportive of Sudbury's aging population. Those applicable policies include:

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.

5) Facilitate ‘aging in place’ to allow residents to live healthy, independent lives in the comfort and dignity of their own homes.

6) Support an active lifestyle for an aging population by increasing the availability and accessibility of social and recreational opportunities.

RESPONSE

Per the policies in **Section 16.2.1**, the proposed development is age friendly and will allow its residents to live healthy, active, and independent lives. It proposes the creation of smaller and more affordable residential dwelling units and the establishment of a 109-guest room retirement home, which will provide the opportunity for aging in place in a location well connected to local amenities, recreational opportunities, and services in the Downtown and broader City of Greater Sudbury. The proposed retirement home’s proximity to Sudbury’s largest urban park will support an active lifestyle and increase the availability of accessibility of social and recreational opportunities.

Section 17.2 of the City’s OP details policies related to housing:

- 17.2.1** *To encourage a greater mix of housing types and tenure, it is policy of this Plan to:*
- a. encourage a wide range of housing types and forms suitable to meet the housing needs of all current and future residents;*
 - b. encourage production of smaller (one and two bedroom) units to accommodate the growing number of smaller households;*
 - c. promote a range of housing types suitable to the needs of senior citizens;*
 - d. discourage downzoning to support increased diversity of housing options; and,*
 - e. support new development that is planned, designated, zoned and designed in a manner that contributes to creating complete communities – designed to have a mix of land uses, supportive of transit development, the provision of a full range of housing including affordable housing, inclusive of all ages and abilities, and meet the daily and lifetime needs of all residents.*

RESPONSE

The development proposal is consistent with **Section 17.2.1** as the proposed mix of residential uses will enhance and promote complete communities that will better meet the daily and lifetime needs of Sudbury residents. With respect to the policies in **17.2.1**, the proposed development will contribute to providing a mix of housing types and tenures in the area. The proposed development includes 109 retirement home guest rooms, 102 one-bedroom units, 284-two-bedroom

units and 35-three-bedroom units, which are suitable for senior citizens, smaller households and other current and future residents.

The proposed development will also contribute to creating complete communities given its mix of land uses, its transit supportive nature and provision of range of housing types and tenures that better meet the daily and lifetime needs of all residents.

Section 17.2.2 speaks to the intersection of housing and economic development:

- 17.2.2.**
- a. promote residential development in the Downtown as a stimulus to downtown revitalization and small business development;*
 - b. support a range of housing types available to seniors, retirees, and younger cohorts by encouraging the development of alternative housing options and exploring opportunities for lifestyle housing targeted to niche markets; and,*
 - c. promote intensified residential development at main commercial nodes in the City as a means of promoting urban redevelopment and achieving effective residential intensification*

RESPONSE

The development proposal promotes residential intensification near the Downtown which may assist with revitalization and the support of small businesses/the City's commercial core.

The development proposal provides a range of housing types which are appropriate for seniors, retirees and younger age cohorts given that three distinct housing types and tenures that are proposed (i.e. retirement guest rooms, freehold condos, and rental apartments).

The subject site falls within the Paris Street corridor. The City-wide Nodes and Corridors Strategy states that, 'Corridors are significant connections either leading to a node or connecting one node to another. These significant corridors are made up of mixed-use areas and are priority areas for long-term investment and revitalization'. Given the proposal represents an intensified residential development on a corridor leading to the Downtown, it may promote urban redevelopment in the City's main commercial node.

OFFICIAL PLAN SUMMARY

The redevelopment of the former hospital site as a high-density residential development with limited commercial use addresses many of the City's Official Plan objectives, including residential intensification, transit supportive development, the efficient use of infrastructure and services, and increasing the mix of housing types and tenures to respond to changing demographic needs.

The proposed development has been designed to be mitigate impact with the existing uses in the surrounding area through good urban design and public realm and landscaping improvements to the site and Bell Park property lines. Future residents will benefit from the development's connectivity, nearby recreational and active transportation opportunities thereby promoting healthy, livable and complete communities. Given all the above the proposal conforms to the City of Greater Sudbury's Official Plan.

GREATER SUDBURY SOURCE PROTECTION PLAN

Pursuant to the *Clean Water Act, 2006*, the Greater Sudbury Source Protection Plan, sets out Source Protection policies addressing existing and potential threats to drinking water. The subject lands are located within the Ramsey Lake Intake Protection Zone 2 (IPZ2) which forms part of the Ramsey Lake Issue Contributing Area which is comprised of all three of the Intake Protection Zone (IPZ) areas (i.e. 1, 2 and 3).

Threats associated with phosphorus are:

- The establishment, operation or maintenance of a waste disposal site within the meaning of Part V of the Environmental Protection Act
- The establishment, operation or maintenance of a system that collects, stores, transmits, treats or disposes of sewage
- The application of agricultural source material to land
- The storage of agricultural source material
- The application of non-agricultural source material to land
- The handling and storage of non-agricultural source material
- The application of commercial fertilizer to land
- The handling and storage of commercial fertilizer
- The use of land as livestock grazing or pasturing land, an outdoor confinement area or a farm animal yard

The threats that are associated with the sodium issue in the Ramsey Lake Issue Contributing Area are:

- The application of road salt
- The handling and storage of road salt
- The storage of snow

As per the City's Source Protection Plan's salt and snow policies, Risk Management Plans may be required for the application of road salt and storage of snow if the exterior parking lot is equal to or greater than 1 hectare in area. The handling and storage of road salt at volumes of 0.5 tonnes or greater is also prohibited. It is noted that the parking area on the subject site is smaller than 1 hectare with majority of the parking being contained within an underground parking structure. It appears there are no significant threats to the drinking water of Ramsey Lake resulting from the proposed development, however, a Sourcewater Protection Plan Application will be submitted as part of complete applications.

COMMUNITY ENERGY AND EMISSIONS PLAN (CEEP)

The *Community Energy and Emissions Plan* (CEEP) is the long-term plan to reduce carbon emissions and pollution in Greater Sudbury. It responds to City Council's *Climate Emergency Declaration* in May 2019, which included a commitment to achieve net-zero emissions by 2050. That means reducing greenhouse gas emissions (GHG) caused by human activity to as close to zero as possible and removing remaining emissions from the atmosphere.

The proposed development assists with achieving Goals **1, 2, and 7** of the CEEP.

GOAL 1: *Achieve energy efficiency and emissions reductions by creating compact, complete communities through infill developments, decreasing dwelling size through an increase in multi-family buildings, and increasing building type mix.*

GOAL 2: *Periodically increase the energy efficiency of new buildings until all new buildings in 2030 onward are Passive House energy efficiency compliant.*

GOAL 7: *Enhance transit service to increase transit mode share to 25% by 2050.*

RESPONSE

The proposed development supports **Goal 1** given that infill and compact, complete communities intrinsically reduce greenhouse gas emissions through being transit and active transportation supportive. The CEEP states that through *'its implementation, it is expected that residential development would focus on multi-family and mixed-use buildings. Apartment and condominium buildings are typically more energy efficient than single family homes. This is in part due to smaller dwelling sizes. The focus on multi-family and mixed-use housing would also result in fewer new single-family homes. By 2050, the share of new single-family homes being built would decrease to 10% of total housing starts'*. The proposed compact development will add 530-units on to an existing primary arterial, increasing the building and type mix as set out in **Goal 1** of the CEEP.

The proposed development supports **Goal 2** given that the development proposes to demolish the existing building and replace such with three new energy efficient buildings.

As transportation is responsible for the most emissions of all sectors in Greater Sudbury, replacing trips made by car with transit trips is an important emissions reductions action. The proposed development supports **Goal 7** given that the development proposes a high-density development on the existing GOVA transit Main Line. As new building and land-use actions are coordinated, enhanced transit services will become increasingly viable with increasing transit frequency, and usage. Additionally, the completion of the Paris-Notre Dame Bikeway and Bell Park's trail network will increase the use of bicycling infrastructure.

RAMSEY LAKE COMMUNITY IMPROVEMENT PLAN

The Ramsey Lake Community Improvement Plan was adopted by the Regional Municipality in 1992 to establish a long-term vision for the Ramsey Lake Area and proposed a set of programmes and development projects to guide future development within the Plan area. The CIP included the St. Joseph’s Hospital site should enhance its landscaping and better integrate the site with Bell Park and the Paris Street corridor. The plan emphasized the importance of regenerating the natural landscape.

RESPONSE

The development proposal assists in achieving the objectives of the CIP through re-naturalizing a site which is presently vacant of vegetation. Landscaped improvements are proposed along the Paris Street and Facer Street frontages as well as between the interface of Bell Park and the residential development (See Figure 25).

Specifically, the development's design proposes to include:

- 43.2% (0.77ha) of landscaped open space where 30% is required per the R4 zone standards
- 3.0-metre-wide landscaped strips (or greater) along all street frontages
- Pedestrian connectivity from Bell Park into the site and to the adjacent Paris Street corridor

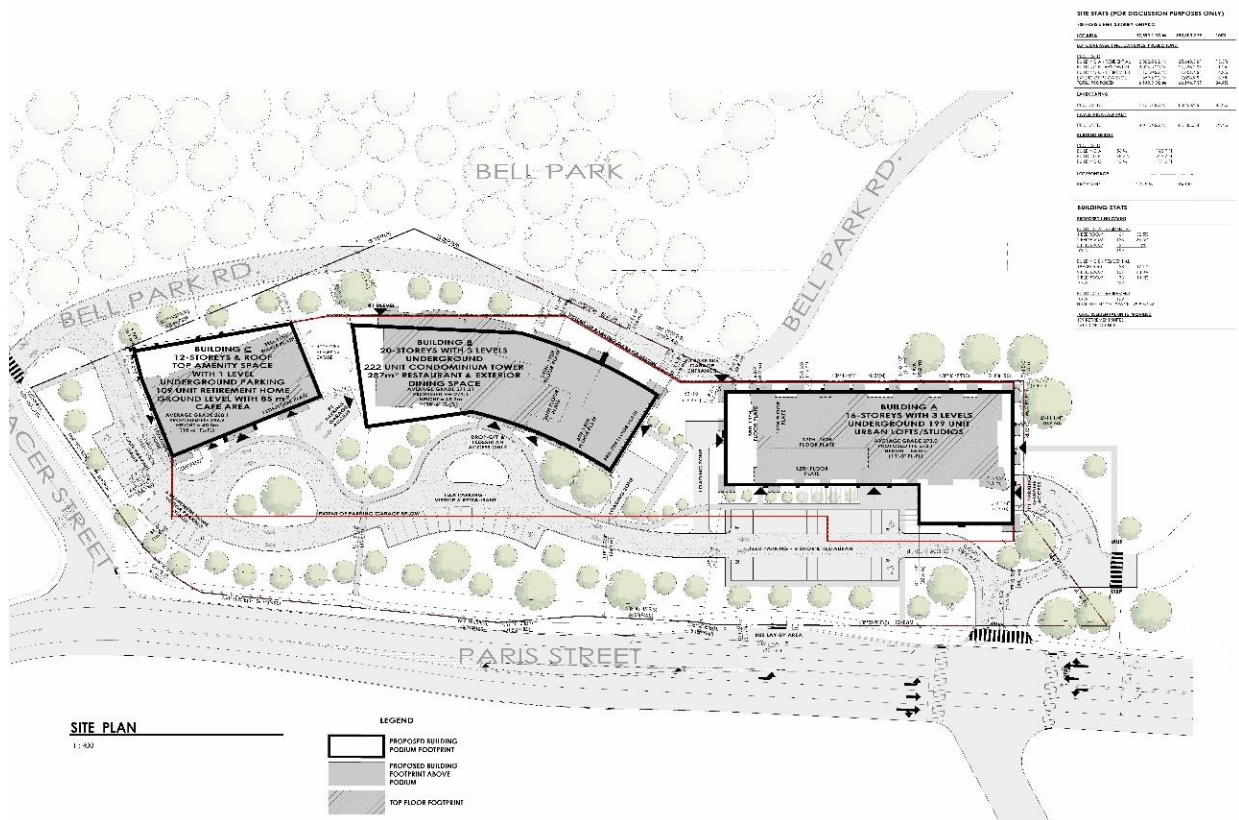


Figure 25: Site Plan showing proposed extent of introduced landscaping

CITY OF GREATER SUDBURY ZONING BY-LAW 2010-100Z

The subject site is presently zoned 'R4(3)' in the *City of Greater Sudbury Zoning By-law 2010-100Z* (See Figure 26).

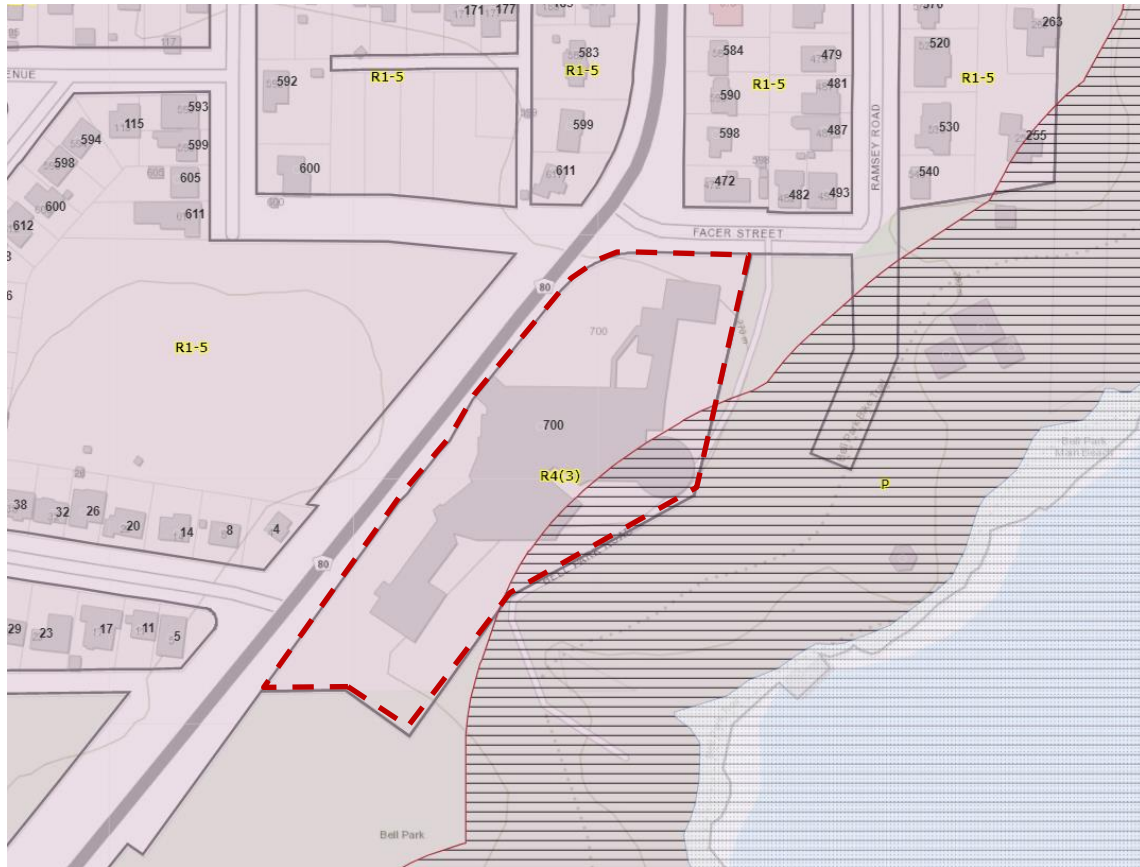


Figure 26: Existing Zoning Map

(210 MULTIPLE DWELLING UNITS)

(c) R4(3) McKim Township Maps Lot 5, Con 2; Lot 5, Con 3

Notwithstanding any other provision hereof to the contrary, within any area designated R4(3) on the Zone Maps, all provisions of this By-law applicable to the R4 Zone shall apply subject to the following modifications:

- i) The lot line abutting Paris Street shall be deemed to be the front lot line;*
- ii) The only permitted uses shall be multiple dwellings with a maximum of 210 dwelling units of which, a maximum of 85 dwelling units shall be permitted in a new building to be located on the lot after November 20, 2012;*
- iii) The maximum number of multiple dwelling buildings permitted on the lot shall be two;*
- iv) The existing building as located on the lot shall be permitted and the enlargement of the existing building shall be permitted within the setbacks to the existing building;*
- v) Notwithstanding (iv) above, the maximum addition permitted to the existing helipad structure shall be one storey located above the helipad platform;*
- vi) The minimum setback from Facer Street to a multiple dwelling shall be 55 metres;*
- vii) The minimum setback from the rear lot line and interior side lot line to a parking structure shall be 2 metres;*

viii) *The minimum setback from the rear lot line and interior side lot line to multiple dwelling units in a building located above a parking structure shall be 7.5 metres;*

ix) *The maximum building height shall be eight storeys and 32 metres;*

x) *The minimum setback from the front lot line to a multiple dwelling comprising a new building to be located on the lot after November 20, 2012, shall be 11.3 metres;*

xi) *The maximum number of surface parking spaces on the lot not including loading spaces shall be 20;*

xii) *The minimum width of a landscape strip abutting Paris Street shall be 2.6 metres and from Paris Street to the existing building the minimum width of the landscape strip shall be 1.3 metres;*

xiii) *Loading spaces shall also be permitted in the corner side yard.*

To facilitate the development, the lands are proposed to be rezoned to an amended 'R4-Special'. To maintain land use compatibility and place the buildings most appropriately on the site, the following development standards are proposed as part of the amending zoning by-law:

- The maximum number of buildings on the lot shall be three:
 - A 109-guest room retirement home with maximum building height of 40.0-metres (12-storeys);
 - A 199-unit multiple dwelling with a maximum building height of 56.0-metres (16-storeys);
 - A 222-unit multiple dwelling with a maximum building height of 68.2-metres (20-storeys); and,
 - All with a 1-3 storey below grade parking structure.
- To require a minimum corner side yard setback (along Facer Street) of 18.0-metres.

In addition to the above standards the development requires the following site-specific relief:

- To permit a lot area of 41m² per unit where 65.0m² would be required for multiple dwellings;
- To permit a rear yard setback of 0.0-metres where 25.0-metres would be required;
- To permit an interior side yard setback of 0.0-metres 21.0-metres would be required;
- To only require at minimum court of 15.0-metres between multiple dwellings where typically 50% of the height of the higher of such walls would be required and,
- To permit a maximum building height for the 222-unit multiple dwelling (Building B only) of 20-storeys and 68.20-metres where a maximum height of 63.0-metres is permitted.

Table 3 compares the proposed development's standards with the Zoning By-Law's High Density Residential (R4) Zone, the Former Hospital's historic condition, and the current R4(3) site-specific zone standards.

Table 3: Zoning Matrix Comparison Table

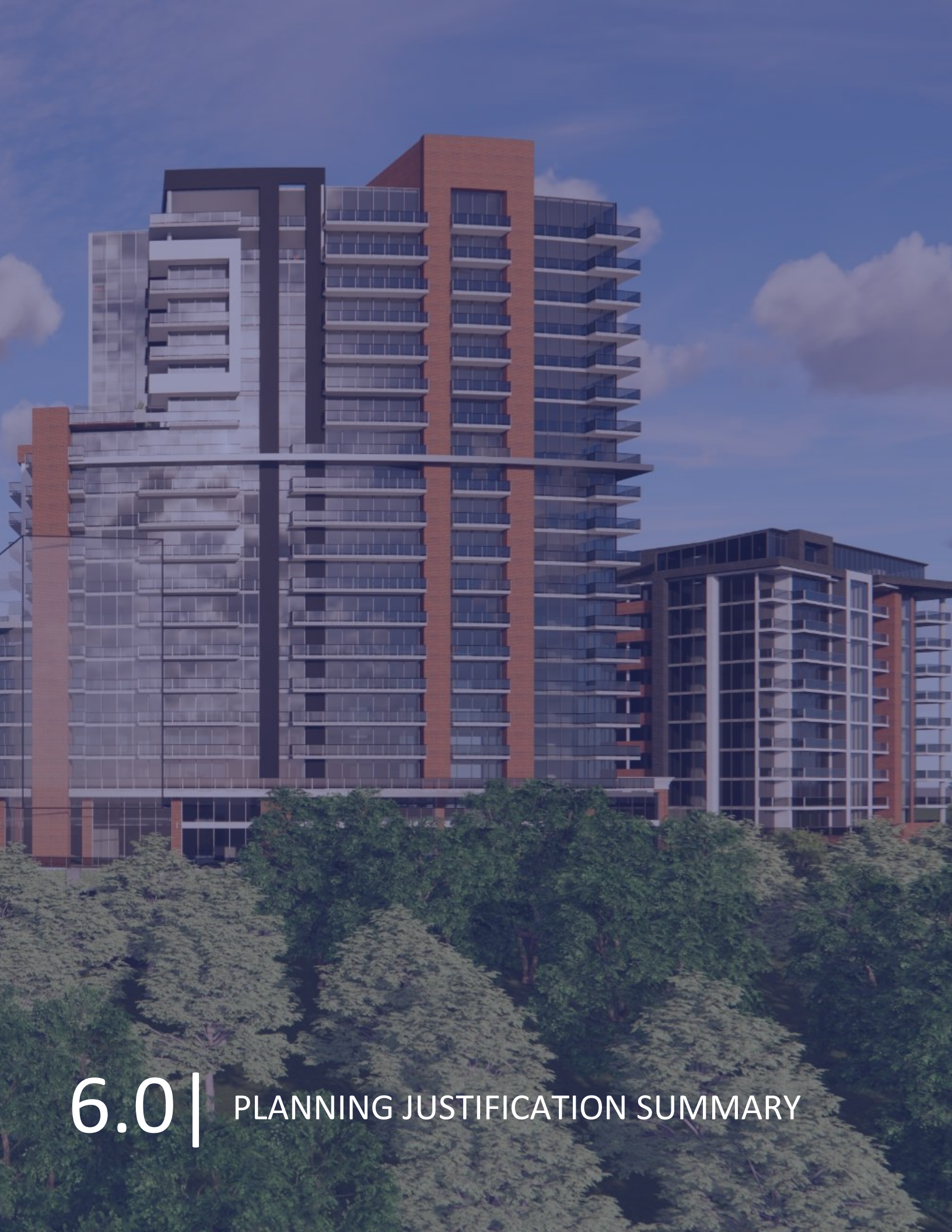
	R4 ZONE	FORMER 360-BED HOSPITAL	CURRENT R4(3) APPROVED SITE PLAN	PROPOSED DEVELOPMENT
Min Lot Area	Multiple Dwelling: 65.0m ² per unit Retirement Home: 1350.0m ²	1.75ha	1.75ha	Multiple Dwellings: 41m ² per multiple dwelling unit (Area: 1.615ha) Retirement Home: 1350.0m ²
Min Frontage	30.0m	232.92m	232.92m	232.92m
Min Lot Depth	45.0m	66.94m	66.94m	66.94m
Min Front Yard (Paris St)	15.0m	7.50m	11.3m	24.1m
Min Rear Yard (Bell Park)	28.0m	4.2m	2.0m (parking structure) 7.5m (for a multiple dwelling located above a parking structure)	0.0m
Min Interior Side Yard (South Lot Line)	21.0m	6.3m	2.0m (for a parking structure) 7.5m (for a multiple dwelling located above a parking structure)	0.0m
Min Corner Side Yard (Facer Street)	10.0m	17.5m	55.0m	18.1m
Minimum Building Separation	15.0m	N/A	N/A	9.7m
Max Lot Coverage	50%	N/A	34.1%	34.4%
Max Height	63.0m	32.5m	32.5m (8-storeys)	Building A: 56.0m (16-storey) Building B: 68.2m (20-storey) Building C: 40.0m (12-storey)
Min Landscaped Open Space	30%	N/A	40.9%	43%

The existing site-specific zoning does not permit a density/level of residential intensification that is appropriate for this unique site. When reviewing all applicable policies against the development proposal, it is this authors opinion that the reliefs required are appropriate to facilitate the highest and best use of the lands, leveraging the site’s infrastructure availability, connectivity to abutting resources and other areas of the City, better utilization of transit investments and housing potential, while being cognizant of the surrounding urban residential context and recreational character of the area.

Specifically:

- The reduction in interior side yard and rear yard setbacks to 0.0-metres is appropriate as the adjacent properties are City owned lands (i.e. Bell Park and municipal parking lot) and therefore impacts typically associated with reducing side yard setbacks to other land uses is minimal (thus the preservation of the R4 zone's required setbacks to such boundaries is unnecessary to maintain compatibility of the proposal, while the retention of such setbacks would represent the underutilization of lands).
- The reduction in lot area per unit is appropriate given that the lands abut a large municipal park providing recreational opportunities to residents, and speciality amenity areas are provided in each building.
- The reduction in the minimum courts between the multiple dwellings is appropriate as building separation is still being provided, while enabling the more efficient use of the lands through a taller built form;
- The increase in height from the existing permissions to 68.2-metre was partially assessed via the Preliminary Pedestrian Wind Assessment and Sun Shadow Study. The Wind Study did not identify issues with the proposed height beyond limited wind reduction measures applicable to taller buildings, and the increased height did not result in sun shadow impacts over residential areas significantly greater than what would be generated by the existing R4(3) zoning permissions between the hours of 9:00am and 6:00pm

Based on the foregoing, the proposed amendment to the zoning by-law is appropriate in implementing the intended land use framework and policy directions of the City's Official Plan and maintains the general intent of the parent zone category (R4) under *Zoning By-law 2010-100Z*.



6.0 | PLANNING JUSTIFICATION SUMMARY

6.0 PLANNING JUSTIFICATION SUMMARY

The proposed Official Plan Amendment and Zoning By-law Amendment will facilitate a development that integrates an appropriate and reasonable mix of uses that is primarily urban residential in nature, along with an enhanced public realm while providing new housing that will help to meet changing demographics/market demands and provincial and municipal intensification targets of creating 3,800 more homes by 2031.

The proposed development represents good land use planning that is in the public interest as it will revitalize a currently underutilized site to provide a high-quality urban development near Sudbury's Downtown and the Ramsey Lake waterfront.

CONSISTENCY WITH PROVINCIAL AND MUNICIPAL PLANNING POLICY

The proposed amendments will facilitate development on a fully serviced site, significantly enhance both the private and public realm, and diversify the neighbourhoods existing housing tenure by provide new housing that assists in meeting projected demographic housing needs and municipal growth and density targets. The site is situated on the City's GOVA main transit line and is directly abutting a large urban park, trails, and other recreational opportunities which promote healthy community living, while better utilizing existing infrastructure. The proposed development is consistent with and conforms with provincial and municipal policy.

COMPATIBILITY/NEIGHBOURHOOD SENSITIVITY

The proposed development is contextually sensitive and appropriately designed with increased setbacks from Facer Street, well sited buildings, step-backs and transitions in height and multiple buildings to reduce effects associated with block-massing.

The use of an underground parking structure to provide an appropriate amount of (non-intrusive/screened) user parking, the proposed streetscape improvements and new landscaping will enhance the street frontages and act to mitigate impacts of the development to the existing community.

The proposed mix of uses will aid in building complete communities and the introduction of scoped restaurant uses serves to maintain compatibility with the surrounding area, while leveraging Bell Park's Ramsey Lake Waterfront.

A RANGE OF HOUSING OPTIONS AND CHOICE

The development proposal incorporates a mix of contextually appropriate housing types and tenures being rental apartments, retirement guest suites and freehold condominium units into a predominately low-density urban residential neighbourhood. The proposed development will therefore support the municipalities target of creating 3800 more units while also diversifying the housing mix of the area and improving the availability of varying housing forms suitable for all demographics in an appropriate location.

TRANSIT ORIENTED & ACTIVE TRANSPORTATION SUPPORTIVE DEVELOPMENT

The proposed development represents transit-oriented development at a transit supportive density. The site benefits from two GOVA transit stops located along the property's frontage, proximity to the Main Downtown Bus Terminal and the future Paris-Notre Dame Bikeway project that will run along the property's Paris Street frontage.

CONNECTIVITY TO THE DOWNTOWN & GREATER SUDBURY

The proposed development is located approximately 800-metres from the City's Downtown which already benefits from having a strong mixed-use urban context. Residents of the development will benefit from proximity to nearby amenities, services and commercial centres within the Downtown, while its location on a corridor is indicative of the connectivity of the site with the broader Sudbury community, allowing residents to have easy access to employment opportunities and everyday needs.

CONCLUSION

Given the land use planning analysis provide herein, it is the author's opinions that the proposed Official Plan Amendment and Zoning By-law Amendment to permit 530-housing units (including retirement residence), along with 380m² of contextually appropriate commercial (restaurant) use is consistent with the 2020 PPS, conforms with the Growth Plan for Northern Ontario and the City of Greater Sudbury Official Plan, represents good planning and is in the public interest.

Respectfully submitted,

Prepared By:



Vanessa Smith, M.Pl., RPP.

Project Manager | Land Use Planner

Reviewed By:



Kevin Jarus, M.Pl., RPP

Planning Manager | Senior Associate