

PLANNING JUSTIFICATION REPORT

870 AUGER AVENUE, SUDBURY
ZONING BYLAW AMENDMENT

AUGUST 2024

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1.0 INTRODUCTION

TULLOCH is retained by the owner of 870 Auger Avenue (being PIN 73570-0144) in Sudbury to prepare a planning justification report as part of a complete application to amend the *City of Greater Sudbury Zoning Bylaw 2010-100Z*.

This planning justification report provides justification for an application that would rezone the subject property from Medium Density Residential - Special (R3-1(29)) to Medium Density Residential - Special (R3(S)) zone. The application would facilitate the internal conversion of a surplus institutional building to a multiple dwelling, and the development of three (3) new, two (2) storey ground-oriented multiple dwelling buildings, for a total of 74 dwelling units. Site-specific relief is requested through the rezoning application and analyzed in this report.

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

- [Provincial Policy Statement \(2020\) \(PPS\)](#)
- [Growth Plan for Northern Ontario \(GPNO\)](#)
- [City of Greater Sudbury Official Plan \(OP\)](#)
- [City of Greater Sudbury Zoning Bylaw 2010-100Z \(CGS ZBL\)](#)

Overall, the author finds that the proposed zoning bylaw amendment conforms with the *City of Greater Sudbury Official Plan* (OP) and *Growth Plan for Northern Ontario* (GPNO), is consistent with the 2020 Provincial Policy Statement (PPS), and represents good planning.

2.0 SUBJECT SITE & SURROUNDING CONTEXT

2.1 SUBJECT PROPERTY

The subject property is located along Auger Avenue, classified as a Collector Road as per Schedule 7 of the OP, south of Hawthorne Drive. The property can be legally described as follows:

PCL 23846 SEC SES SRO; BLK B PL M518 NEELON; GREATER SUDBURY

The subject parcel has a total area of ± 1.82 hectares with ± 76.16 metres of frontage along the east side of Auger Avenue, and a depth of ± 197.55 metres. Topographically, the property is relatively flat with partial vegetation/tree coverage, particularly bordering the parcel limits (see Figures 1-3). The subject property is occupied by a vacant institutional building that was home to St. Bernadette Catholic Elementary School, built in 1957 and closed in 2015.

As per Schedule 1b of the OP, the subject lands are designated Living Area I, and located within the Settlement Area and Built Boundary. This property is fully serviced by municipal sewer and water infrastructure. The property is also serviced by the GOVA transit system, located along Transit Route 12 – Second Avenue. The nearest northbound bus stop for route 12 is located directly in front of the property on Auger Avenue, and a southbound bus stop is located ± 70 metres just south of the property.



Figure 1: Subject Property Looking Southeast



Figure 2: Subject Property Looking West from Easterly Lot Line



Figure 3: Subject Lands Showing Existing Building

2.2 SURROUNDING CONTEXT

The site is surrounded by residential lands to the north, west, and south, and bounded to the east by a municipal park. The surrounding area consists of a mix of single detached dwellings, along with institutional and industrial uses within a kilometre of the subject property (see Figures 4-5). Surrounding uses can be described as follows:

NORTH: Low-density residential, institutional uses, commercial uses

WEST: Low-density residential, medium-density residential, institutional uses

SOUTH: Low-density residential, medium-density residential, and commercial uses

EAST: Industrial uses, open space, institutional uses



Figure 4: Auger Street and Nearest Transit Stop Looking North from Subject Lands



Figure 5: Auger Street and Abutting Residential Looking South from Subject Lands

2.3 PRIOR ZONING BYLAW AMENDMENT

The site was subject to a previous rezoning application. In 2018, the *City of Greater Sudbury* changed the zoning classification of the lands from Institutional (I) to Medium Density Residential – Special (R3-1(29)) to permit a maximum of 38 row-dwellings and accessory uses. Site-specific provisions were applied to the minimum northerly and southerly interior side yard setbacks, requiring a setback of 7.5 metres where 1.8 metres would otherwise be required for a 2-storey row-dwelling in the R3-1 zone. The previous owner had proposed to demolish the existing institutional building to facilitate the development.

At the time of the application, a main concern of the public was the potential traffic impact to the local road network. The City's Roads and Transportation Services advised that there was sufficient capacity within the adjacent road network to support the development and had no concerns related to local traffic impacts. In addition, the City concluded that traffic volumes produced by the 38 row-dwellings would be less than what was produced by the former school and daycare.

3.0 PROPOSED DEVELOPMENT

The subject Zoning Bylaw Amendment application proposes to rezone the lands from Medium Density Residential Special (R3-1(29)) to Medium Density Residential Special (R3(S)). The application would facilitate the internal conversion of the existing institutional building to a multiple dwelling and the development of three (3), new two (2) storey ground-oriented multiple dwellings, for a total of 74 units throughout the site (see Figures 6-10). A holding symbol is proposed to permit only 20 multiple dwelling units within the existing institutional building until municipal sanitary sewer services are adequate and available to service the remaining 54 dwelling units.

The proposed development would be subject to Site Plan Control if approved.

Parking areas are to be located adjacent to the proposed dwellings, accessed by a driveway along the property's south side. A total of 133 parking spaces will be provided.

Included within the parking areas will be five (5) accessible parking spaces and one (1) loading space, with potential for a second loading space. Sidewalks along Auger Avenue will be retained along with existing pedestrian access to the abutting park at the northeast corner of the property. An additional pedestrian walkway to the park from the property is proposed at the southeast corner of the property. Additional details regarding the existing and proposed buildings are provided in *Table 1: Development Statistics*.

Table 1: Development Statistics

Building	Ground Floor Area	Gross Floor Area	# Dwelling Units	Proposed Height
<i>Existing Building</i>	± 1670.86m ²	± 1670.86m ²	20	Same as existing
<i>Proposed Westerly Building</i>	± 735.134m ²	± 1470.268m ²	16	< 11m
<i>Proposed Central Building</i>	± 824.451m ²	± 1648.902m ²	18	< 11m
<i>Proposed Easterly Building</i>	± 913.42m ²	± 1828.84m ²	20	< 11m

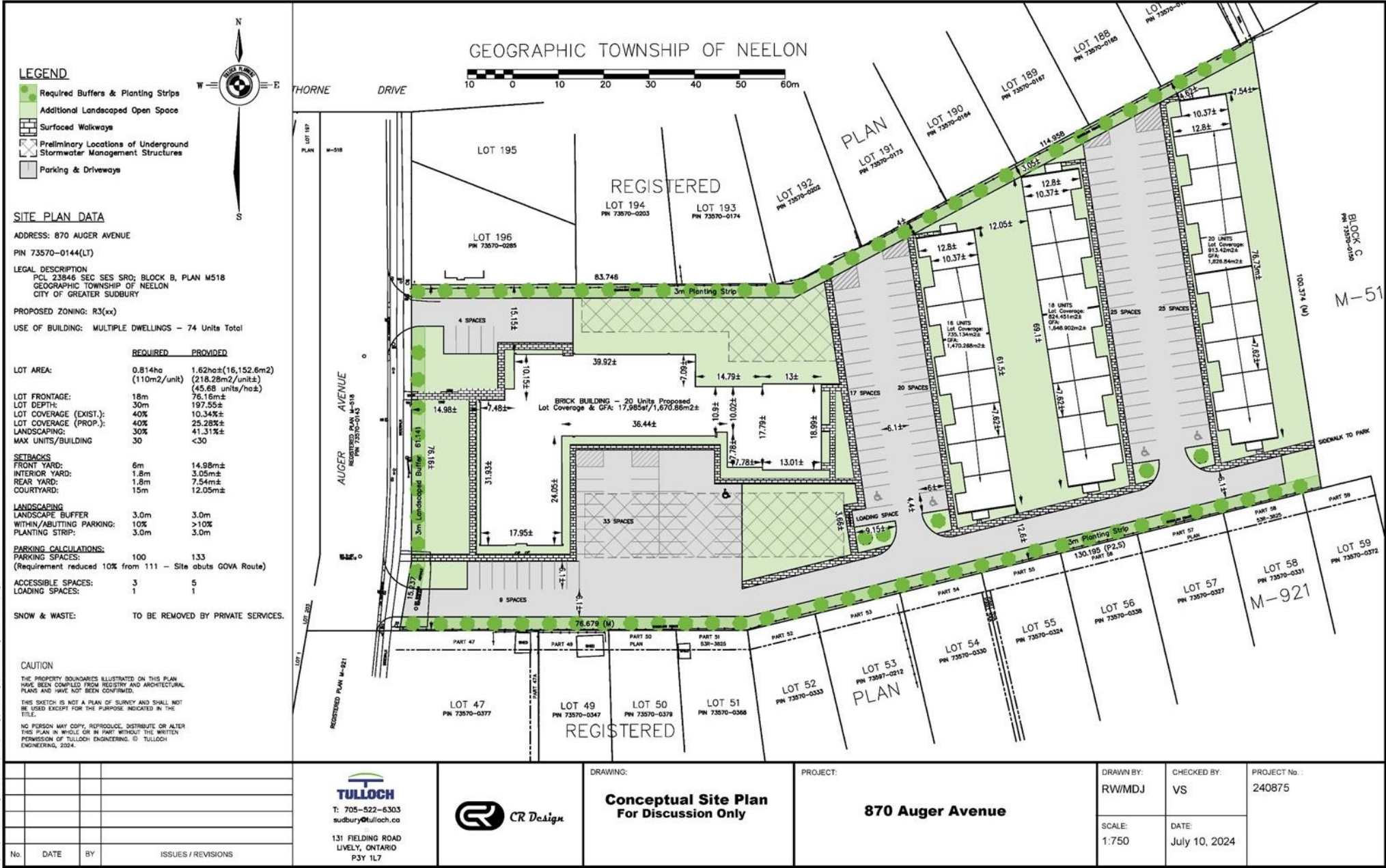


Figure 6: Conceptual Sketch



Figure 7: Rendering of Proposed Development by CR Design



Figure 8: Rendering of Proposed School Redevelopment by CR Design



Figure 9: Rendering of Proposed Development by CR Design



Figure 10: Rendering of Proposed Development by CR Design

4.0 POLICY OVERVIEW AND ANALYSIS

The following section sets out the relevant planning policy framework to assess the appropriateness of the application in the context of provincial and municipal policies and regulations.

4.1 PROVINCIAL POLICY STATEMENT, 2020 (PPS)

The *2020 Provincial Policy Statement* (PPS) provides high-level provincial policy direction for planning approval authorities in preparing municipal planning documents, and in making decisions on Planning Act applications. Municipal Official Plans must be consistent with the Provincial Policy Statement. Policies applicable to the proposed Zoning Bylaw Amendment are discussed below.

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;*
- d) ...*
- 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;*

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;*
- ...*
- e. support active transportation;*
- f. are transit-supportive, where transit is planned, exists or may be developed;*

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

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

b. permitting and facilitating:

- 1. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and*
- 2. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;*

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

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

e. requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and

f. establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.

1.7.1 *Long-term economic prosperity should be supported by:*

a. promoting opportunities for economic development and community investment-readiness;

b. encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce;

c. optimizing the long-term availability and use of land, resources, infrastructure and public service facilities

4.2 GROWTH PLAN FOR NORTHERN ONTARIO (GPNO)

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. Policies applicable to the proposed zoning by-law amendment are outlined below.

- 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.*

4.3 CITY OF GREATER SUDBURY OFFICIAL PLAN (OP.)

The *City of Greater Sudbury Official Plan* (OP) is the principal land use planning policy document for the City of Greater Sudbury. The OP establishes objectives and policies that guide both public and private development/decision-making. Policies applicable to the proposed zoning bylaw amendment are outlined below.

- 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.*
- 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.*
- 2.3.3.5** *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 of the 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 manmade hazards; and,*
- k. the provision of any facilities, services and matters if the application is made pursuant to Section 37 of the Planning Act.*

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.*

- 3.2.1.2** *In medium density developments, all low density housing forms are permitted, including small apartment buildings no more than five storeys in height to a maximum net density of 90 units per hectare.*
- 3.2.1.4** *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.*
- 3.2.2.1** *New development in Living Area I will occur adjacent to existing built-up urban areas. Emphasis will be placed on achieving a mix of uses and densities that allow for the efficient use of land, infrastructure and public service facilities.*
- 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.*
- 16.2.1** *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;*
- 16.2.3** *Provide accessible, affordable and convenient public transportation to Greater Sudbury's aging population to conduct their daily activities;*
- 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;*

...

- 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.*

4.4 CITY OF GREATER SUDBURY ZONING BYLAW 2010-100Z

The lands are proposed to be rezoned to a Medium Density Residential - Special (R3(S)) zone to permit the conversion of the existing institutional building to a multiple dwelling and the development of three (3) new, two (2) storey ground oriented multiple dwelling.

Table 2 below identifies the zone standards applicable to the application.

Table 2: R3-1 Zone Provisions

R3 & R3-1 Zone Provisions	R3 & R3-1 Zone Standards	Existing (R3-1(29)) Zone Requirements (Row dwellings)	Proposed Development (Multiple Dwellings)
Minimum Lot Area	150m ² /unit (row dwellings) 110m ² /unit (multiple dwellings)	150m ² /unit <i>the only permitted use shall be a maximum of 38 row dwellings and uses accessory thereto</i>	± 218m ² /unit
Minimum Lot Frontage	18.0m	± 76.16m	± 76.16m
Minimum Lot Depth	30.0m	± 197.55m	± 197.55m
Minimum Required Front Yard	6.0m	6.0m	± 14.98m
Minimum Required Rear Yard	7.5m	7.5m	± 7.54m
Minimum Required Interior Side Yard	1.8m	7.5m	± 3.05m
Maximum Lot Coverage	40% (R3) 50% (R3-1)	40%	± 25.28%
Minimum Landscaped Open Space	30%	30%	± 41.31%
Maximum Height	11.0m (19.0m for multiples in R3-1)	11.0m (row dwellings)	<11m

Table 3 below details other zone standards applicable to the development.

Table 3: Other Zoning Provisions

Other Zoning Provision	Required	Provided
Parking Spaces	111 or 100 (with ZBL Section 5.3.1 reduction)	133
Accessible Spaces	3 spaces	5 spaces
Loading Spaces	1 space	1 space
Bicycle Spaces	36 spaces	38 spaces
Maximum Units per Building	30-units	20-units
Minimum Court	15.0m	± 12.05m (requesting relief for 10.0m)
Planting Strip	3.0m	3.0m
Landscaped Buffer	3.0m	3.0m
Drive Aisle Widths	6.0m	6.1m

5.0 PLANNING RATIONALE

The following section of this Report provides a planning rationale for the proposed zoning bylaw amendment application with respect to the applicable policy and regulatory framework detailed in Section 4.0.

5.1 SUITABILITY OF SUBJECT LANDS

A key planning objective for residential development is to achieve neighbourhoods with a variety of housing types and tenures to better respond to the changing needs of residents. Such development should have a compact development form that efficiently utilizes land, and servicing infrastructure, and is compatible with the surrounding community. This objective is conveyed through both provincial and local land use planning policy direction.

The proposed development is located within the settlement area boundary of Sudbury, which per the PPS, shall be the focus of growth and development. The proposal would also assist the City in reaching its goal of accommodating 20% of future residential growth and development through intensification within the built boundary, as identified in the OP. Further, the application proposes new development taking place in a designated growth area, which is adjacent to the existing built-up area.

Greater Sudbury is identified as an Economic and Service Hub in the GPNO, which should be designed to accommodate a sizable portion of future population and employment growth in Northern Ontario. Further, the development proposes to increase the range and mix of housing types in the neighbourhood through the addition of multiple dwelling units in an appropriate location, being in proximity to existing public open spaces, and local stores and services.

The OP contains policies related to the phasing of development to achieve the efficient use of land and land use patterns. New development and redevelopment of vacant or underutilized sites are to occur within existing built-up urban areas and proposals are to consider the following:

- Achievement of intensification targets
- Infill within the Living Area 1 designation
- A logical use of infrastructure and public service facilities
- Round out the development of existing neighbourhoods

The proposed development achieves the above objectives, given it assists in meeting intensification targets and rounds out an existing Living Area 1 area on full municipal services.

This development would represent a density of 40.7 units per hectare, which is just above the low-density classification of 36 units per hectare in the City's OP. The proposed built forms are compatible with the surrounding neighbourhood due to the proposed orientation of the new buildings (i.e., the shortest side of the buildings interacting with adjacent R1-5 properties); low-rise built forms (one and two-storey heights), and landscaped open space and vegetative buffering being introduced throughout. The proposed development was also evaluated against the tests for intensification and rezoning over lands designated Living Area I, as outlined in **Sections 2.3.3.9 & 3.2.1.6** of the OP. It is the author's opinion that the proposal meets such tests, considering the application:

- Is proposed over a property that is of a suitable size (± 1.82 ha) and regular shape (± 76 m of frontage and depth of ± 197 m) to accommodate the proposed multiple-dwelling complex in conformity with applicable zoning provisions (see Section 4.4 of this report).
- Zoning relief is requested for a reduced court in between the multiple dwelling units. This reduction would not hinder the functionality of the site or compatibility with the surrounding neighbourhood, and still maintain an appropriate separation and privacy distance between units;
- Proposes a residential development that is compatible with the existing and planned character of the area. The property is situated within an area of predominantly low-density residential uses. The property abuts such uses along the northerly and southerly lot lines, and full 3-metre wide planting strips are proposed in these areas to provide a screen/buffer between the proposed development and the existing single-detached dwellings to the north and south. In addition, the new multiple-dwelling buildings are proposed to be 2 storeys in height, which aligns with the height of many of the surrounding single-detached dwellings;
- Respects the landscaping requirements in the zoning bylaw where medium-density residential uses fall adjacent to low-density residential uses. As noted above, full 3-metre-wide planting strips are proposed adjacent to all low-density residential uses, in addition to having 41% of the site as landscaped open space;
- Proposes medium-density residential development directly adjacent to a City-owned open space known as Grassy Hill Park thereby providing future residents with direct access to further passive recreation and open space areas. The application also proposes to maintain pedestrian connectivity to the park space as seen in Figure 6.
- Proposes a residential development over a property that can make more efficient use of the existing infrastructure and public service facilities such as nearby park/open space areas;

- Proposes to appropriately limit the number of multiple dwelling units through a holding symbol until such time sanitary services are appropriately upgraded;
- Provides adequate ingress/egress, off-street parking areas and safe and convenient vehicular circulation;
- Has direct access and frontage on a collector road (Auger Avenue), which further enhances compatibility with the surrounding neighbourhood as traffic generated from the subject lands would not have to interact with adjacent local roads to access arterial roads such as Falconbridge Road or Lasalle Boulevard;
- Traffic Memorandum results by Tranplan indicate that the proposed development would have lesser traffic impact than the former school and daycare operations;
- Would enhance existing transit and active transportation networks in proximity to the property, given the proposed increase in density

5.2 INCREASED HOUSING OPTIONS

The creation of diverse neighbourhoods with varying dwelling types and sizes, including a wider range of lot sizes and built forms, better supports the housing needs of increasingly diverse residents and household types (such as young families, professionals, older adults, and people with disabilities). Given that the abutting residential development is made up of primarily single detached dwellings, it is desirous of both provincial and local policy to diversify the housing mix to increase the range of housing options throughout the City. This application proposes the addition of more affordable housing types (such as apartment-style and ground-oriented multiple dwelling units), adding necessary housing to meet the needs of a varied demographic and socio-economic population.

The PPS contains policies that speak to providing for an appropriate range and mix of housing options and densities. Such policies further speak to the efficient use of land through the incorporation of compact development that can be accommodated by existing municipal services. This application proposes a multiple dwelling complex that can be appropriately accommodated, and more efficiently use existing municipal infrastructure such as sewer and water services, transit and active transportation networks and nearby public service facilities.

Per the GPNO, the subject application would promote a further range of housing types in the community by introducing apartment-style and ground-oriented multiple-dwelling units to an area that largely consists of single detached dwellings. Further, and as previously discussed, the City of Greater Sudbury is defined as an economic and service hub in the GPNO. As such, the City is intended to accommodate a significant portion of future population and employment growth in Northern Ontario. To accommodate this growth, a range and mix of housing options are needed to meet the social, health, economic and well-being requirements of future residents.

The City's OP encourages a wide range of housing types and forms suitable to meet the housing needs of all current and future residents and create or contribute to complete communities. The proposed development would assist in meeting the City's objectives related to built form and the provision of new rental housing units. *The City of Greater Sudbury Housing Supply Strategy* (2023) identified the need for rental housing throughout the City, and that the development of new rental housing has not kept pace with demand, causing low vacancies, long waitlists and rising rents. The application would assist in

providing more rental housing and a wider range of housing styles in the area. In addition, it encourages the development of housing types that may be suitable for senior citizens and provides more affordable housing options, compared to what currently exists in the surrounding neighbourhood. Lastly, the application supports the creation of complete communities by adding a mix of built forms, and housing options inclusive of all ages and abilities while meeting the daily needs of residents.

5.3 SERVICING AND INFRASTRUCTURE

The PPS and OP contain policies related to managing and directing land use to achieve efficient and resilient development and land use patterns. The application promotes efficient development and land use patterns by proposing development on a site well suited for the proposed medium-density residential development. This is partially owing to the subject lands being serviced by full municipal sewer and water services.

The existing sewer capacity can support 20 multiple-dwelling units within the former institutional building. For the remaining 54 ground-oriented multiple dwelling units, the proposal includes a holding provision until municipal infrastructure is upgraded and has the capacity to service such units.

The proposed built forms make better use of existing municipal servicing to the subject lands, thereby promoting the financial well-being of the Municipality and Province in the long term. It is also noted that the development would contribute to the efficient use of land, infrastructure, and public service facilities, and would support the ability to provide transit to existing and future residents of the neighbourhood, thereby reducing residents' reliance on automobiles.

5.4 MUNICIPAL STRATEGY FOR SURPLUS SCHOOLS

As per the Best Practices and Municipal Strategy for Utilizing Surplus School Properties for Housing and Community Services report, the City has identified surplus institutional properties as ideal sites for housing redevelopment. This is due to the fact that:

- Former schools sites are typically centrally located, making them easily accessible and close to essential services and amenities;
- Former schools sites are often situated in well-established residential areas, reducing the likelihood of land use conflicts;
- Repurposing vacant buildings is an efficient way to utilize both existing and new construction materials;
- Former school buildings are highly versatile, accommodating a wide range of uses and programs through redevelopment.

The above aligns with **Section 2.3.3.6** of the OP, which encourages intensification on sites that are no longer viable for the purpose for which they were intended such as former institutional sites. The subject property is no longer viable for institutional use, and it is the author's opinion that such property represents an ideal location for the proposed redevelopment given its location, proximity to transit/active transportation, and mix of surrounding land uses (including open space, institutional, industrial, commercial and residential areas) and ability to more appropriately use existing full municipal services (i.e., road maintenance, water and sewer, garbage collection, emergency services etc.).

5.5 RELATIONSHIP TO THE STRATEGIC PLAN, HEALTH IMPACT ASSESSMENT AND COMMUNITY ENERGY & EMISSIONS PLAN

The City of Greater Sudbury's goal is for all citizens to have access to safe, affordable, attainable, and suitable housing options. Strategic objectives seek to improve services and housing for current and potential future residents seeking to make the City of Greater Sudbury home. The proposed development and its related density provide an opportunity to maximize the use of infrastructure investment by the City, which is consistent with achieving energy efficiency and emissions reductions by creating compact, complete communities.

6.0 CONCLUSION

The application is consistent with the *2020 Provincial Policy Statement* as it represents a more efficient use of land, infrastructure and public service facilities and provides a mix of context-appropriate densities and housing types appropriate for a range of demographics.

The application conforms to and does not conflict with the Growth Plan for Northern Ontario as the Plan contains policies which promote healthy community planning by providing for a range of uses and housing forms such as apartment-style and ground-oriented multiple dwelling units that are located in proximity to employment areas, public open spaces, local stores and services.

The application conforms to the *City of Greater Sudbury Official Plan* and is supported by policies which encourage compatible infill development, and a range and mix of built forms and housing types and tenures. Moreover, the redevelopment is centrally located, is in proximity to amenities and essential services, efficiently utilizes existing municipal infrastructure and contributes to complete community planning through the revitalization of an underutilized parcel.

Given the analysis provided herein, it is the author's opinion that the subject rezoning is consistent with the 2020 PPS, is consistent with the *Growth Plan for Northern Ontario*, conforms to the intent of the *City of Greater Sudbury Official Plan*, and represents good planning.

Respectfully Submitted,

Prepared by:

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