



## PROPOSED CHANGES TO THE CITY OF GREATER SUDBURY'S OFFICIAL PLAN – LASALLE CORRIDOR STUDY

The Ward 8 Community Action Network thanks you for the opportunity to comment on the proposed changes to the City's Official Plan that are being presented to the Planning Committee on December 9, 2019.

We want to first note that trying to understand what actual changes are being proposed was extremely difficult, given that there was no track changes document provided, and that there were several source documents that had to be cross-checked with one another to get a true picture of the changes.

What is available on the City's website (Agendas Online, Over To You, and the Lasalle Corridor Study website page) is not easily understood by a layperson. As Chair of the Ward 8 CAN, I spent well over 12 hours going over the provided Planning Committee meeting attachments and the Official Plan, as well as talking to staff. Meaningful engagement means making it easy for the general population to understand; this was not the case in this instance.

No one from our CAN was able to make the open houses that were scheduled in early November. While we understand that there were letters sent out to specific addresses along the corridor, and information apparently posted in the newspapers in October, our CAN was not aware that the open houses were being held until the social media "reminders" were sent out two days prior to the meetings. As a primary stakeholder that provided input in the past to the Lasalle Corridor Study, our CAN was not directly notified of these opportunities for input. A final note that the survey questions on Over To You were very open-ended, and provided little guidance that would facilitate meaningful feedback on the specific recommendations.

That being said, we want to thank Ed Landry for the time he took over the phone to help decipher the proposed material. That was extremely helpful and was really the only reason we were able to provide the detailed feedback that we are providing to you on these very important changes that will drive significant change to the Lasalle Corridor.

### GENERAL COMMENTS

We support the direction that proposes refining the policy structure and hierarchy of the corridors in Greater Sudbury. We support creating the new categories Secondary Community Nodes and Regional Corridors, and that these areas would be medium change areas eg medium scale intensification and development would be permitted (changes to section 2.3.3). We also support that in regards to employment areas, Secondary Community Nodes and Regional Corridors would allow a balance of mixed uses including commercial, general industrial, institutional, residential, and parks and open space (changes to section 4.0).

While there are general statements in the OPA that refer to climate change resiliency, there is no mention of Climate Change, or the use of a climate change lens applied to the proposed OPA changes. In discussions with Ed Landry, we understand that the zoning changes that are forthcoming will better define the permitted activities so look forward to seeing those changes done in coordination with the recommendations of the Community Energy and Emissions Plan, and the mitigation plan which are both due to be completed in 2020. Will there be opportunities to further refine the OPA once these plans have been completed, and goals and strategies have been approved by Council? After the goals

and direction are approved, it will be extremely important to immediately re-evaluate the contents of these area descriptions, as well as the sections 11.0 Transportation, 14.0 Urban Design, 17.0 Housing, and other sections.

In order to meet the proposed goals in the CEEP, we must be more aggressive in how we encourage and discourage growth and activities in key areas of the city. High density growth needs to be mandated in corridors like Lasalle, which is designated as a major transit spine. We look forward to seeing the following addressed and clarified: green infrastructure and zero carbon buildings; stormwater management; parking requirements; transit; a Complete Street approach which targets safety and comfort - including dedicated, separated pedestrian and cycling infrastructure on both sides of the street, safe crossings and other changes that prioritize our most vulnerable road users; flooding mitigation; streetscaping and public art; connections with neighbourhoods and local trails and paths; urban trees and greenspace.

## CHANGES TO REGIONAL CENTRE DESIGNATION (SECTION 4.2.2)

### PREAMBLE

Existing:

*Regional Centres are local and regional retail and tourism destinations and strategic core areas in northern Ontario. Three Regional Centres are designated based on the existing pattern of development as indicated on Schedules 1a and 1b, Land Use Map:*

- *Kingsway at Barry Downe Road / Second Avenue;*
- *Lasalle Boulevard at Barry Downe Road; and,*
- *Regent Street at Paris Street / Long Lake Road.*

*Traditionally linked to retail and business services, Regional Centres may include other uses such as medium and high density residential, as a means of utilizing existing infrastructure and achieving increased urban intensification. The intent of this Plan is to encourage planning for these areas to function as vibrant, walkable, mixed use districts that can accommodate higher densities and provide a broader range of amenities accessible to residents and visitors.*

With the current City focus on climate change mitigation (the draft Community Energy and Emissions Plan and its target goals), and the focus on active transportation, we suggest that the preamble explicitly identify cycling in:

*“The intent of this Plan is to encourage planning for these areas to function as vibrant, walkable, **bikeable**, mixed use districts that can accommodate higher densities and provide a broader range of amenities accessible to residents and visitors.”*

The trend in Europe and now with other Canadian cities that has seen an explosion of e-bikes will mean that residents of Greater Sudbury, given the challenges of topography and our aging population, will greatly embrace e-bikes. We need to prepare, encourage, and plan for additional residents who will no doubt look at cycling in all seasons in the future.

### POLICY 1

Existing:

*Permitted uses in Regional Centres may include retail, service, institutional, recreational, entertainment, office and community-oriented activities.*

Proposed: add residential

Permitted uses in Regional Centres may include retail, service, **residential**, institutional, recreational, entertainment, office and community-oriented activities.

We agree with change that residential development would be permitted in Regional Centres, along with the existing retail, service, institutional, recreational, entertainment, office and community-oriented activities. Many cities are now promoting high-density residential development in particular in mall areas, and this will bring our city into alignment with these changing trends.

## POLICY 2 (NEW)

New proposed:

*Regional Centres shall be planned to:*

- i. encourage a pedestrian-friendly built form by locating commercial and other active non-residential uses at grade;*
- ii. develop at transit-supportive densities;*
- iii. provide for a mix of housing types, tenures and affordability;*
- iv. be designed to implement appropriate transitions of density and uses to facilitate compatibility with surrounding existing lower density neighbourhoods;*
- v. include, where appropriate, open spaces that are either parks and/or plazas accessible to the public; and,*
- vi. provide mobility choices and associated facilities to encourage alternate active transportation options.*

It is our understanding that City parks are not permitted in Regional Centres and that the intent of item v (will this become e in the OPA?) is to encourage private parks in areas owned by businesses including malls. We are suggesting that clarification should be provided to indicate that this section applies to privately owned open spaces.

We would like to see a discussion as to why public City parks are not permitted in Regional Centres; it is our view that small parks and parkettes would definitely be appropriate.

*“include, where appropriate, open spaces that are either parks and/or plazas accessible to the public; and,”*

## POLICY 3 (NEW)

New proposed:

*“Reductions in parking shall be considered in order to promote a greater mix of uses and a more compact, pedestrian-friendly built form.”*

We very much support creating this policy, which will permit adjustments to parking requirements. With the new CEEP targets for transit and active transportation, as well as our new Transportation Demand Management Plan, we must begin to re-evaluate how we encourage a shift away from car and truck travel, and the current parking regulations. Our recommendation is to explicitly also include cycling-friendly.

*“Reductions in parking shall be considered in order to promote a greater mix of uses and a more compact, pedestrian-friendly **and cycling-friendly** built form.”*

## POLICY 4

Existing:

*“Regional Centres may be appropriate locations for certain light industrial uses which are conducted entirely indoors provided that appropriate landscaping and buffering can be established to shield any adjacent sensitive uses. Outside storage is not permitted unless it is for the purpose of displaying goods for retail sale.”*

The original recommendation was to eliminate light industrial uses, but that recommendation is not being recommended at this time. There is no rationale behind this recommendation, and we would welcome additional discussions as to why it should be maintained.

#### RENUMBERED POLICY 5 (ORIGINAL POLICY 2)

Existing:

*When considering rezoning applications for new or expanded employment uses in Regional Centres, the City will have regard to the following criteria:*

- a. off-street parking can be adequately provided;*
- b. a traffic impact study may be required to identify any necessary improvements to upgrade the transportation network to ensure that traffic-carrying capacity of the road is not significantly affected;*
- c. no new access to Arterial Roads is permitted where alternate access is available. In general, entrances will be kept to a minimum and at locations with the least impact on traffic flow. The use of joint entrances will be encouraged;*
- d. pedestrian walkways will be included, with linkages to transit stops and other modes of active transportation including sidewalks and trails; and,*
- e. sewer and water services must be adequate for the site.*

Regarding this policy, we suggest adding in the following wording in section d.:

*“pedestrian walkways **and cycling infrastructure** will be included, with linkages to transit stops and other modes of active transportation including sidewalks, **cycling infrastructure** and trails; and,”*

#### EXISTING POLICY 5 (RENUMBERED TO POLICY 6)

Proposed elimination:

*“Regional Centres will be planned as high quality areas that support active transportation and transit as outlined in Sections 11.3.2 and 11.8, and Chapter 14.0, Urban Design.”*

There is no rationale as to why this is eliminated so we are unsure of the impact.

#### EXISTING POLICY 3

Proposed elimination:

*“Medium and high density residential development may be considered as a means of promoting urban redevelopment and achieving residential intensification targets.”*

We understand that policy 3 is being eliminated because of the change in policy 1 that adds residential as a permitted activity and see no issues with this.

## SECONDARY COMMUNITY NODES (NEW SECTIONS 4.2.3)

We are in agreement with the intent of the Secondary Community Nodes section, and the preamble that describes a vibrant environment for these areas. We are suggesting that we explicitly add cycling as an important component of this preamble. It is also our thought this vibrancy should be also applied to Regional Centres; perhaps the preamble for Regional Centres needs to be adjusted to include some of the language around buildings, parking lots, entrances, landscaping, and active transportation. This would highlight that while there are differences in the designations, the transition between Regional Centres, Secondary Community Nodes, and Regional Corridors would nevertheless include the important elements that define a pleasant, vibrant, walkable, and bikeable city.

*“Secondary Community Nodes meet a variety of needs and are intended to provide for a broad range and mix of uses in an area of transit-supportive densities. The Secondary Community Nodes are designated based on the role they play in the City’s nodes and corridors strategy. In general, Secondary Community Nodes are nodes along the City’s strategic corridors with a concentration of uses at a smaller scale than a Regional Centre.*

*Given the function and high visibility of Secondary Community Nodes, special attention to urban design principles is essential. Siting buildings to create a sense of street enclosure, locating parking lots to the rear of buildings, screening service entrances and garbage storage, and effective landscaping can aesthetically enhance the appearance of Secondary Community Nodes. In order to attract viable, high-quality development, emphasis will also be placed on creating a safe and attractive pedestrian **and cycling** environment, as well as convenient access to public access and greenspace. Additional policies on Urban Design are found in Chapter 14.0.”*

### POLICY 1

Proposed:

*“Secondary Community Nodes shall be located on primary transit corridors and shall be planned to promote a local identity and a sense of place unique to that node and its surrounding community.”*

This is a policy that is not explicitly identified for Regional Centres. Because of their very nature, it may be implied that Regional Centres will be transit hubs that connect primary transit corridors, but it would be good to identify this in the Regional Centres section.

### POLICY 2

Proposed:

*“Permitted uses in Secondary Community Nodes may include residential, retail, office, service, institutional, parks and other community-oriented activities.”*

The differences that are identified between Regional Centres and Secondary Community Nodes are that Regional Centres allow recreational and entertainment activities which are not permitted in Secondary Community Nodes; and Secondary Community Nodes permit parks which are not permitted in Regional Centres. Both allow residential, retail, office, service, institutional, and other community-oriented activities. It is unclear to us why these differences exist. Also see the note in the Regional Centre area relating to permitting City parks.

### POLICY 3

Proposed:

*The mixing of uses should be in the form of either mixed use buildings with ground oriented commercial and institutional uses and residential uses above the second storey, or a mix of uses and buildings on the same development site.*

This policy very clearly identifies the mixed use of buildings that will be encouraged. There is no such policy for Regional Centres. The only reference to building uses in that section is in the preamble: *“Traditionally linked to retail and business services, Regional Centres may include other uses such as medium and high density residential, as a means of utilizing existing infrastructure and achieving increased urban intensification.”* We have no recommendation at this time, but simply a comment that Policy 3 clearly encourages particular building forms while there is no corresponding policy in Regional Centre. Also and that the wording “should be” nevertheless implies that it is not mandated; perhaps we should be using stronger language to mandate what kind of built forms will be permitted in each area.

### POLICY 4 (MISNUMBERED POLICY 3)

Proposed:

*“Secondary Community Nodes shall be planned to:*

- a. encourage a pedestrian-friendly built form by locating commercial and other active non-residential uses at grade;*
- b. be the focal point for expression of community heritage and character;*
- c. develop at transit-supportive densities; d. provide residential development primarily in the form of medium and high density buildings, and discouraging single-detached dwellings; e. provide for a mix of housing types, tenures and affordability;*
- f. be designed to implement appropriate transitions of density and uses to facilitate compatibility with surrounding existing lower density neighbourhoods; and,*
- g. provide mobility choices and associated facilities to encourage alternative active transportation options.”*

This policy, as compared to its companion Policy 2 in Regional Centres, has the following differences:

- Additional *“be the focal point for expression of community heritage and character;”*
- Additional *“provide residential development primarily in the form of medium and high density buildings, and discouraging single-detached dwellings;”*
- Not included *“include, where appropriate, open spaces that are either parks and/or plazas accessible to the public;”*

We agree that community heritage and character should be preserved and encouraged, and also that densification should be encouraged (eg discouraging single-detached dwellings). We would suggest that this section would also benefit from encouraging privately-held open spaces, in particular in mall-type areas eg Montrose Mall.

### POLICY 5 (MISNUMBERED POLICY 4)

Proposed:

*“Reductions in parking shall be considered in order to promote a greater mix of uses and a more compact, pedestrian-friendly built form. The City may require a traffic impact study and/or a transportation demand management plan in support of the reduction in parking.”*

This is the companion to the policy identified in Regional Centres, and is slightly different, as it includes the statement regarding a traffic impact study specifically related to a reduction in parking. It is unclear to us why this statement is in this section and not in the Regional Centres section. Also, as in Regional Centres, include *cycling-friendly*.

*“Reductions in parking shall be considered in order to promote a greater mix of uses and a more compact, pedestrian-friendly **and cycling-friendly** built form. The City may require a traffic impact study and/or a transportation demand management plan in support of the reduction in parking.”*

## REGIONAL CORRIDORS (NEW SECTION 4.2.4)

Proposed preamble:

*“Regional Corridors are the primary arterial links connecting the City’s Regional Centres and Secondary Community Nodes. They are a significant component of the nodes and corridors structure and provide additional opportunities for intensification. These corridors function as “main streets”, each with unique characteristics and identities but at lesser densities and concentrations than development within Regional Centres and Secondary Community Nodes. Given the function and high visibility of Regional Corridors, special attention to sound urban design principles is essential. Siting buildings to create a sense of street enclosure, locating parking lots to the rear of buildings, screening service entrances and garbage storage, and effective landscaping can aesthetically enhance the appearance of Regional Corridors. In order to attract viable, high quality development, emphasis will also be placed on creating a safe and attractive environment, as well as convenient access to public access and greenspace. Additional policies on Urban Design are found in Chapter 14.0.”*

We are in agreement with the intent of the Regional Corridors, and the preamble that describes a vibrant environment for these areas. As with the Secondary Community Nodes, we are suggesting explicitly including cycling in the preamble.

*“In order to attract viable, high quality development, emphasis will also be placed on creating a safe and attractive pedestrian **and cycling** environment, as well as convenient access to public access and greenspace. Additional policies on Urban Design are found in Chapter 14.0.”*

### POLICY 1

Proposed:

*“Regional Corridors shall be located on primary transit corridors and shall be planned to promote a local identity and a sense of place unique to that node and its surrounding community.”*

We agree with this policy.

### POLICY 2

Proposed:

*“Permitted uses in Regional Corridors may include medium density residential, retail, service, institutional, parks, open spaces, office and community-oriented uses at transit supportive densities in compact, pedestrian-friendly built forms.”*

The differences that are identified between Secondary Community Nodes and Regional Corridors are that Regional Corridors permit medium-density residential and open spaces. We are unsure of the definition of open spaces and why they are specifically identified in this section and in none of the other sections.

The differences that are identified between Regional Centres are that Regional Centres allow recreational and entertainment activities which are not permitted in Regional Corridors; and that Regional Corridors, like Secondary Community Nodes, permit parks which are not permitted in Regional Centres. See the comment in Regional Centres regarding parks.

Regional Corridors also specify the uses are “*at transit supportive densities in compact, pedestrian-friendly built forms*”. We would suggest that if this phrase is used here, it should be used for all three designations, and that the words “cycling-friendly” be added into the phrase.

*“Permitted uses in Regional Corridors may include medium density residential, retail, service, institutional, parks, open spaces, office and community-oriented uses at transit supportive densities in compact, pedestrian-friendly **and cycling-friendly** built forms.”*

### POLICY 3

Proposed:

*Regional Corridors shall be planned to:*

- a. provide for a mix of housing types, tenures and affordability;*
- b. encourage a pedestrian-friendly built form by locating commercial and other active non-residential uses at grade;*
- c. provide residential development primarily in the form of medium density buildings;*
- d. be designed to implement appropriate transitions of density and uses to facilitate compatibility with surrounding existing lower density neighbourhoods; and, e. develop at transit-supportive densities;*
- f. function as they transit spines for the City while also facilitating other active modes of transportation*
- g. In order to minimize the disruption of traffic flow along arterial roads and promote better development, small lot rezoning will be discouraged and land assembly for consolidated development will be promoted. Land assembly will reduce the need for additional driveways along arterials and can be used to promote a more consistent streetscape.”*

This policy, as compared to its companion Policy 4 in Secondary Community Nodes, has the following differences:

- Does not include being a focal point for community heritage and character
- Residential development emphasis is on medium density buildings and not high density, and does not discourage single-detached dwellings;
- Functions as a transit spine
- Speaks to small lot rezoning and land assembly
- Does not encourage alternative active transportation options

Some of these corridors may not be long in length, and therefore be very bikeable between community nodes. Our recommendation is to encourage alternative active transportation options in the same language as Secondary Community Nodes: “provide mobility choices and associated facilities to encourage alternative active transportation options.”

Please note that the “and” at the end of section d should be at the end of section f.



## POLICY 4

Proposed:

*“Reductions in parking shall be considered in order to promote a greater mix of uses and a more compact, pedestrian-friendly built form. The City may require a traffic impact study and/or a transportation demand management plan in support of the reduction in parking.”*

Same comment as to Policy 5 in Secondary Community Nodes.

## MIXED USE COMMERCIAL (4.3)

Proposed third and fourth paragraphs in the preamble:

*“Some areas of Greater Sudbury have been developed with a mix of land uses. Although there are some exceptions, these uses are generally concentrated along certain stretches of Arterial Roads. These areas meet a variety of needs. They also support and, in some instances, connect strategic core areas. Designated as Mixed Use Commercial and complementary to the Secondary Community Nodes and Regional Corridors designations and shown on Schedules 1a, 1b and 1c, Land Use Map, it is the intent of this Plan to recognize the development potential of these areas by permitting a balance of mixed uses including commercial, institutional, residential, and parks and open space through the rezoning process. General industrial uses may also be permitted subject to their compatibility with surrounding uses and their overall visual impact on mixed use corridors (see Chapter 14.0, Urban Design). It is also the intent of this Plan to encourage these areas to support active transportation and transit.*

*Similar to the Secondary Community Nodes and Regional Corridors designations, and given the function and high visibility of Mixed Use Commercial areas, special attention to sound urban design principles is essential. Siting buildings to create a sense of street enclosure, locating parking lots to the rear of buildings, screening service entrances and garbage storage, and effective landscaping can aesthetically enhance the appearance of mixed use corridors. In order to attract viable, high quality development, emphasis will also be placed on creating a safe and attractive pedestrian environment, as well as convenient access to public transit and greenspace. Additional policies on Urban Design are found in Chapter 14.0.”*

In the second paragraph, cycling should specifically be mentioned: *“In order to attract viable, high quality development, emphasis will also be placed on creating a safe and attractive pedestrian **and cycling** environment...”*

## POLICY 1

New proposed (replacing existing):

*Uses permitted in the Mixed Use Corridor designation shall provide for a broad range of uses that serve the needs of the surrounding neighbourhoods including medium density residential, commercial, institutional, parks and other open space uses at a lesser density and concentration than Regional Corridors. Offices as part of a mixed use development shall be permitted*

The difference between Mixed Use Commercial and the two new designations is that it uses the language “commercial” which is not found in the other designations. The other designations permit “retail, office, service”. Are these the same or different? Is it the intent that light commercial is eliminated here, while it is not in Regional Centres?

## POLICY 2

New proposed (added with remaining policies renumbered):

*Where appropriate, the mixing of residential and non-residential uses on a single site is encouraged. Mixed uses should be in a form of mixed-use buildings with ground-oriented commercial and institutional uses and residential uses above the second storey.*

We have no issue with this.

## ADDITIONAL COMMENTS

Mixed Use Commercial does not contain any language that prioritizes pedestrian, cycling, and transit. This should be added to this designation.

## PARKING (11.4)

### NEW POLICY 3

Proposed:

*“Parking requirements may be reduced where feasible through implementation of the following tools:*

- a. Establishment of minimum and maximum parking standards with the Regional Centre, Secondary Community Nodes and Regional Centres;*
- b. Reducing parking requirements in the Regional Centre, Secondary Community Nodes and Regional Corridors where transit, cycling and pedestrian alternatives exist;*
- c. Provision of shared parking facilities for uses with alternating high peak demand either by virtue of the uses or the time of day, time of week or seasonal demand; and,*
- d. Provision of central, shared parking facilities that may result in greater parking and land use efficiencies.”*

We very much agree with the content and intent of the new section 3. Should item a. read “...maximum parking standards **within** or **in** the Regional Centre ...”?

We also suggest that bicycle parking should be included as a direction in the Parking section, perhaps in a change in Policy 1:

*“New developments generally must provide an adequate supply of **vehicle and bicycle** parking to meet anticipated demands.”*

## SECTION 19.5.5, SECTION 37 BY-LAWS

### NEW THIRD AND FOURTH PARAGRAPHS:

Proposed:

*“Section 37 By-laws may also be used to secure priority community benefits such as the provision of improved pedestrian and cycling access to public transit and enhanced public transit infrastructure, facilities and services; public parking; provision of public areas, crosswalks and walkways; provision of public streetscape improvements; enhanced access to natural heritage features and other open space areas; upgrade to community facilities; land required for municipal*

*purposes; and, any other community benefits that may be identified in Secondary Plans, Community Improvement Plans, or other community improvements that may be identified through the development approval process.*

*Community benefits which are the subject of Section 37 provisions of the Planning Act will be determined based on local needs, intensification issues in the area, and the goals and objectives of this Plan.”*

We have no issues with the suggested changes.

Note that this section and the parking section page references in the ATTACHMENT A - TABLE 1 – Summary of Recommended OP Changes are incorrect.

## PART OF SCHEDULE 1A & 1B: LAND USE CITY OF GREATER SUDBURY OFFICIAL PLAN

### OPA 102

Attachment C – Regional Centre North Side of Lasalle across from the New Sudbury and Superstore Malls to Regional Centre – no concerns save for the impact on the Junction Creek Trail, the impact of lack of cycling infrastructure on Paquette, and how we integrate both sides of Lasalle with its current configuration of 4 lanes and priority on car movement into a vibrant, cohesive community.

Attachment D – Secondary Community Node Lasalle/Notre Dame intersection – no concerns save for the required redesign of this intersection to provide safe pedestrian and cycling movement from the Paris/Notre Dame Bikeway to what we’d like to call the Lasalle Bikeway, and as for all of the Lasalle, the current pedestrian and cycling unfriendliness of the whole corridor which does not make it very liveable or vibrant. The whole of Lasalle needs to be revitalized so people will want to walk, bike, and live on it.

Attachment D – Secondary Community Node Montrose Mall area – how will the south side designation impact the significant wetlands and where do they border or intersect? Same comments re corridor revitalization.

Attachment E – Regional Corridor Lasalle west from Starlight to the Data Center – what would be the impact should Felix Ricard ever close? Same comments re corridor revitalization. Attachment E – Regional Corridor west from Secondary Community Node Montrose Mall to Regional Centre – no concerns. Same comments re corridor revitalization.

Attachment F – Regional Corridor east from Regional Centre to Falconbridge Road – concerns: impact on Junction Creek Trail and green space east of the creek on the south side, and around the creek on the north side. Same comments re corridor revitalization, only more important. This area has very little housing directly on Lasalle in the area from Rosemarie to Falconbridge, there is no sense of community there, traffic speeds regularly. What would be impact if Jean-Ethier Blais were ever to close? What is the impact of having a primary school on a 4-lane arterial road with the speeds and volume of traffic and lack of safe active transportation (until the Lasalle Bikeway is built)?