

For Information Only

City of Greater Sudbury Housing and Homelessness Plan Annual Update

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Resolution

For Information Only

Relationship to the Strategic Plan / Health Impact Assessment

This report supports Council's Strategic Plan in the area of Quality of Life and Place as it aligns with the Population Health Priorities of Families, Resiliency and Housing. The Housing and Homelessness Plan Update provides actions that have taken place in 2017 that address homelessness, and affordable housing initiatives taking place in the community.

Report Summary

This report provides an update on actions taken in 2017 as they relate to Homelessness, Planning and Social Housing within the Housing and Homelessness Annual Update.

Financial Implications

There are no financial implications associated with this update report.

Signed By

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Health Impact Review

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Financial Implications

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Background

The Long Term Affordable Housing Strategy developed by the Ministry of Municipal Affairs and Ministry of Housing recognized that local Service Managers across the Province are best positioned to understand and respond to the changing housing and homelessness needs of their respective communities. The Housing Services Act (HSA), 2011 and the Long Term Affordable Housing Strategy Update required Service Managers to create comprehensive, multi-year plans for local housing and homelessness services to be in place by January 1, 2014.

The Housing and Homelessness Plan (the Plan) is intended to address areas of provincial interest while guiding municipalities in creating a flexible, community centred housing and homelessness system. City of Greater Sudbury Council approved Greater Sudbury's original Housing and Homelessness Plan via resolution CS2013-53 on November 18, 2013 at the Community Services Committee Meeting. A copy of the Plan was reviewed by the Minister of Municipal Affairs and Housing to ensure that it met all legislated requirements.

Planning, Housing, and Social Services have been working together over a number of years to coordinate and harmonize local housing and homelessness programs, and have established a community network to deliver services. These Divisions will continue to collaborate with their partners and stakeholders while moving the housing and homelessness system to a more coordinated, people centred system.

The goal of the City of Greater Sudbury's Housing and Homelessness Plan is to ensure systems are in place along the full housing continuum to facilitate citizen access to affordable housing. The Plan's guiding principle is to continue to support community based delivery of housing and homelessness services.

Priorities

The City of Greater Sudbury's Housing and Homelessness Plan identified six (6) priority areas:

- Improve housing options across the housing continuum.
- Improve housing access and affordability for low income households.
- Strengthen approaches to preventing homelessness, increase the diversity of emergency shelter options and support individuals with multiple barriers in obtaining and maintaining their housing.
- Additional supportive services coupled with permanent housing (both supportive housing and supports in private homes).

- Improve coordination, collaboration, and partnerships among a broad range of stakeholders.
- Monitor and report on progress towards meeting the Housing and Homelessness Plan objectives and targets.

Planning, Housing, and Social Services along with community partners have developed actions and objectives to address the priorities. Appendix A – Housing and Homelessness Priorities Update 2017 provides detail on each priority, including the objectives, actions taken, and actions planned.

Reporting

As part of the Long Term Affordable Housing Strategy Update, the government made several commitments related to performance measures and reporting. One of the commitments requires the Service Managers to report annually to the public on the progress of their Plans based on the previous year's activities. Creating an annual reporting progress requirement is intended to enhance local transparency and accountability, while ensuring the local communities remain engaged in the Plan through regular progress updates.

Next Steps

Planning, Housing, and Social Services will continue to work in partnership with the community to meet the objectives within the priority areas identified in the Plan and will report back to the Community Services Committee annually on the measures taken and the progress made.

References

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#	Priority	Objectives	Completed in 2017	Planned for 2018
1	There is a need to improve housing options across the housing continuum.	<p>Improve and maintain the existing housing stock.</p> <p>Improve the accessibility of new housing and full utilization of existing housing stock.</p> <p>Increase the diversity of affordable housing options.</p> <p>Increase community acceptance of and provide consistent support for multi-residential housing.</p>	<p>The City of Greater Sudbury (CGS) participated in the Green infrastructure Funding Program. A grant was secured to retrofit a social housing complex on Bruce Avenue. The conservation measures that were completed on the property were: installation of new heating control system to regulate power input to electric baseboard heaters; installation of new windows, balcony doors and balcony storm doors; and replacement of T8 fluorescent bulbs in corridors and common areas with LED lighting.</p> <p>43.6% of all new dwelling units created were single detached, 41.9 % were semi-detached, duplex, row house, and townhouses.</p> <p>CGS approved 4 temporary zoning applications for Garden Suites.</p> <p>CGS approved 18 applications for a second unit in a single detached home, 2 in semi-detached dwellings and 2 in accessory buildings.</p> <p>CGS processed 3 Site Plan applications for Multi-Residential Buildings with a total of 65 residential units.</p> <p>CGS processed 1 Site Plan application, with a total of 117 units added to a retirement home.</p> <p>CGS processed 1 Site Plan application for alternate level of care housing, with a total of 12 units added to a congregate care home.</p>	<p>Phase 1 of the five year review of the City's Official Plan is scheduled to go before Council for adoption in the first half of 2018.</p> <p>A new Section is proposed to be added to the Official Plan as part of the Phase 1 amendment, which speaks to planning for an aging population. The proposed policies help ensure that Greater Sudbury is an elder-friendly community that facilitates "aging in place" by supporting the creation of age-friendly housing options, providing accessible, affordable and convenient public transportation; and supporting an active lifestyle for an aging population.</p> <p>A new Section is proposed to be added to the Official Plan as part of the Phase I amendment, which recognizes the vital role rental housing plays in the housing continuum and limits the conversion of rental units to condominium ownership.</p> <p>The new Downtown Community Improvement Plan (CIP) has been approved which aims to address challenges facing Downtown Sudbury by using financial mechanisms (grants and loans) to reduce the cost of development and redevelopment in the Downtown, including an incentive to increase the residential population of the downtown through a per door grant.</p> <p>Affordable housing projects are exempt from paying Development Charges, provided they remain affordable in perpetuity. Second units are exempt from Development Charges unless the unit is within an accessory structure or within a new residential building.</p>

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			<p>Building Services has established a Second Unit Registry to track second units which are now permitted as of right, provided they meet certain criteria. To date, 11 second units have been registered.</p> <p>Housing Services participated in the Social Housing Improvement Program funded by the Federal & Provincial Governments through the Social Infrastructure Fund (SIF). 10 Social Housing Providers as well as the LHC (Greater Sudbury Housing Corporation) were able to complete renovations related to energy efficiencies within their projects to ensure sustainability of the project.</p> <p>The Town Centre Community Improvement Plan (CIP) has been updated. The CIP aims to address challenges facing the town centres by using financial mechanisms (grants and loans) to reduce the cost of development and redevelopment in the town centres of Capreol, Chelmsford, Levack, Flour Mill, Lively, Copper Cliff and Kathleen Street, including an incentive to increase the residential population in these centres through a per door grant.</p> <p>Two RFP's were being released in the Spring of 2017 in order to increase the supply of affordable rental housing. Provincial and Federal Government funding has been provided through the Investment in Affordable Housing – extension 2014 and the Social Infrastructure Fund. The rental housing component of both funds will ensure that safe, adequate, and affordable rental housing is available to households within the</p>	<p>Options for exempting all second units will be explored in 2018.</p> <p>Approximately 76 households will have the ability to participate in the ON Renovates Program. This program assists low to moderate income homeowner households to repair their home to bring it to an acceptable standard while improving the energy efficiency of the unit and/or increase accessibility through modifications or adaptations. The funding provided will be in the form of a forgivable 10 year loan of up to \$20,000. The unforgiven portion of the loan would be repayable should the home be sold prior to the 10 year term. The Household is required to have a total income below \$85,200, and the value of the home cannot exceed \$253,068.</p> <p>An expression of interest was submitted to the Ministry of Housing in April 2018 to the Innovation, Evidence and Capacity Building (IEC) Fund that aims to increase local sector capacity, encourage an evidence-based orientation, and support sustainability of the social housing system under the key themes of the Long Term Affordable Housing Strategy update. The IEC fund will provide grants of varying amounts up to a maximum of \$100,000. This fund gives Service Managers the ability to support local system transformation regarding social housing modernization. The proposals recommended for funding should increase sector capacity to manage change, develop new skills and/or take advantage of new opportunities; encourage evidence-based orientation and/or a culture of continuous improvement within the housing and homelessness</p>

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			<p>community.</p> <p>93 households received funding through the ON Renovates Program. This program assists low to moderate income homeowner households to repair their home to bring it to an acceptable standard while improving the energy efficiency of the home and/or increase accessibility through modifications or adaptations. The funding provided was in the form of a forgivable 10 year loan of up to \$20,000. The unforgiven portion of the loan is repayable should the home be sold prior to the 10 year term. The Household was required to have a total income below \$85,200, and the value of the home could not exceed \$253,068.</p> <p>RFP for Social Housing Revitalization Project awarded in 2017 to develop a Portfolio Revitalization and Capital Financing Plan to identify where the social housing gaps are and develop a plan that aligns the social housing portfolio with the needs of the community.</p> <p>Housing Services purchased Asset Planner Software which will be used to identify and prioritize capital renewal needs and develop capital plans across the social housing portfolio.</p>	<p>sector. The proposal should support capacity of the system in relation to at least one of the key themes of the Long Term Affordable Housing Strategy Update which includes a sustainable supply of housing stock, a fair system of housing assistance, coordinated and accessible support services, goal of ending homelessness, indigenous housing strategy, and effective use of evidence and best practices to inform policy and program development, and to define and measure outcomes.</p> <p>The funding requested will assist with the cost of a Community Social Housing portfolio revitalization plan. The goal is to have a practical and comprehensive plan that will enable the Community to move forward with revitalization of the social housing portfolio in a fiscally prudent manner. The plan will assist in meeting the goals and objectives outlined in the CGS Corporate Strategic Plan, the Greater Sudbury Housing Corporation Strategic Plan, and the CGS Housing and Homelessness Plan. Revitalization plans are well recognized as excellent capital asset management plans in the social housing industry. Currently the social housing stock does not meet the demographic need reflected in the Social housing wait list now or as projected in the future. There is a significant mismatch between available social housing stock and the wait list demand. This fund would assist with the cost of the consultant to complete the revitalization plan.</p> <p>Housing Services provided a business case to the Ministry of Housing for the Social Housing Apartment Improvement Program (SHAIP) a program which invests</p>

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				<p>carbon market proceeds to fund eligible greenhouse gas reduction retrofits in social housing apartment buildings of 150 units or more. Funding was secured to retrofit an apartment building at 1960 Paris Street. The conservation measures planned include replacement of 2 make-up air units, LED lighting retrofit, underground garage heating retrofit & insulation, replacement of DHW booster pumps and new doors and windows.</p> <p>Asset Planner software training will be provided to Housing Services as well as non-profit and co-operative housing providers. This software will assist Housing Services in determining capital investment priorities across the social housing portfolio and will help housing providers develop long-term capital plans. This will help ensure the long-term viability of the social housing stock.</p> <p>Planning Services in collaboration with Housing Services, through the Fair Housing Plan, submitted an Expression of Interest to the Ministry of Housing for the Development Charges Rebate Program and was successful in obtaining funding. This program is a measure to increase supply of housing by providing development charges rebates for purpose-built market rental development.</p> <p>The Social Housing Revitalization Project Phase 1 will be development of a Strategic Asset Management Framework which is broken down into tasks including the following: Supply and Demand Analysis, Stakeholder Consultation, Portfolio Real Estate Analysis, Case Study Analysis and Best Practices, Portfolio Rationalization Analysis, Preparation of the</p>

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				<p>Base Case and then Final Report. Phase 2 of this project which is the Plan Development stage is scheduled to begin towards the end of 2018 and project completion expected in 2019.</p> <p>Housing Services will be participating in the GreenON Social Housing Fund Program which funds retrofits in social housing apartment building to reduce greenhouse gas emissions. 4 Social Housing Providers will complete retrofits which will help reduce greenhouse gas emissions, increase the comfort and quality of life for low-income and vulnerable tenants, decrease operating costs for social housing providers and increase long-term sustainability of existing social housing stock.</p>
2	There is a need to improve housing access and affordability for low income households.	Improve housing access and affordability for low income households.	<p>Information about subsidized housing, affordable housing and housing allowance programs was communicated to low income households through CGS Social Services, Housing Services, homelessness service providers, non-profit and cooperative housing providers, and community agencies.</p> <p>27 households were assisted through the Housing Allowance Program operated by the City of Greater Sudbury Housing Services</p> <p>57 households were assisted through the shared delivery of the Sudbury Housing Assistance Rent Program (SHARP). CGS Investment in Affordable Housing for Ontario (IAH-E) funding was allocated to the shared delivery of the Sudbury Housing Assistance Rent Program (SHARP). We are currently in Year 4 of a five</p>	<p>Through the Provincial Home For Good funding 20 Housing Allowances will be available to persons who are participating in the Housing First program through the Homelessness Network. The Housing First program provides ongoing case management supports to people who have experienced chronic homelessness and require additional supports to maintain housing, including access to affordable housing.</p> <p>In 2017 the City of Greater Sudbury (City) will be working with community partners to develop an affordable housing strategy targeting seniors and those with low incomes. It will focus on innovative affordable housing options, the removal of barriers, and consideration of incentives to their development and the utilization of surplus municipal property.</p> <p>Ministry of Housing has introduced amendments to</p>

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			<p>year program. CGS partners in this venture include the Ministry of Finance and the Ministry of Housing.</p> <p>503 households were housed through the CGS Housing Registry (49 Seniors (60 yrs +)). Of these, 30 households were designated Special Priority Placement status, and 78 households received Urgent Status.</p> <p>People who utilized the services of the Off The Street Low Barrier Emergency Shelter were assisted in completing applications for urgent status with the CGS Housing Registry and partnerships were developed between CMHA, Ontario Works, and Housing Services to maintain communication with these applicants.</p> <p>The Health and Housing Working Group has updated the Affordable Housing Strategy which includes 5 action items: development of an Affordable Housing Community Improvement Plan, investigating amendments to the Zoning By-law to be more flexible and encourage affordable housing development across the continuum, investigate amendments to the Parkland Disposal By-law, designate a single point of contact for affordable housing and develop a consolidated affordable housing webpage and investigate changes to the Development Charges By-law to ensure that affordable housing criteria are in line with any Federal or Provincial funding programs.</p>	<p>ON Reg. 367/11 to provide a framework for a Portable Housing Benefit (PHB). The concept of a PHB as a valuable tool could provide tenants greater choice and give Service Managers greater flexibility in meeting the diverse needs of the community. The PHB would be Service Manager funded. This fund could provide more timely access to housing assistance, provide incentives to earn income, relieve pressure on existing RGI stock, reduce wait lists, and allow for mixed income communities that address unique local needs. A portable housing benefit could empower vulnerable tenants. Service Managers have found that when a benefit is tied to a tenant instead of a unit, tenants have more choice and landlords are more likely to better maintain their properties to attract and retain tenants. A portable housing benefit may help tenants avoid unnecessary moves, allowing them to stay in their communities, close to family and places familiar to them.</p> <p>Housing Services will maintain contact with both Provincial and Federal government to ensure the community is apprised of all future program and funding opportunities.</p> <p>The Health and Housing Working Group will be undertaking public consultation on the Draft Affordable Housing Community Improvement Plan in June 2018 and adoption of a final version of the Plan in July 2018. The draft CIP includes a series of financial incentive programs to encourage the creation of affordable housing within the built boundary.</p> <p>The Health and Housing Working Group will also</p>

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				undertake public consultation on draft amendments to the Zoning By-law in June 2018 and approval of amendments in July 2018. The amendments would permit shared housing along certain arterial roads, reduce parking requirements for certain affordable housing projects and introduce a zone category which permits a smaller lot area.
3	There is a need to strengthen approaches to preventing homelessness, increase the diversity of emergency shelter options and support individuals with multiple barriers in obtaining and maintaining their housing.	<p>Ensure emergency accommodation is available when needed, but focus on transitioning to permanent housing.</p> <p>Address the needs of the most vulnerable populations of homeless.</p> <p>Address the need for additional education and awareness of social housing providers and landlords of available crisis services and supports for tenants with special needs.</p>	<p>Continued to work with community partners on meeting the priorities within the Harm Reduction Strategy that will address the needs of persons who are chronically homeless with active addictions, including locating a facility that will house a full time residential program.</p> <p>In 2017 Council approved the transfer of the surplus municipal facility at 200 Larch St to the Canadian Mental Health Association for use as a residential Harm Reduction Home, a permanent low barrier emergency shelter, and for other services and supports for persons experiencing homelessness.</p> <p>The Harm Reduction Home is a day program for alcohol dependent individuals who are homeless or at risk of homelessness and offers access to meals, primary care, skills development, social supports and a managed alcohol program.</p> <p>The Harm Reduction Home has demonstrated success</p>	Continue to work with community partners on meeting the priorities within the Harm Reduction Strategy that will address the needs of persons who are chronically homeless with active addictions, including locating a facility that will house a full time residential program.

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			<p>for the participants in:</p> <ul style="list-style-type: none"> • reduced emergency department visits, hospitalization, police involvement and EMS use • improved health and well being • transition to more stable, supportive housing <p>For the fourth full winter CGS opened a Low Barrier Emergency Shelter Program, called Off the Street which provided up to 30 additional cots per night for persons who were homeless, under the influence of drugs or alcohol, or otherwise disengaged from mainstream shelter programs.</p> <p>The program was open from November 28th 2016 to April 30th 2017. During this time 291 uniquely identified individuals stayed overnight and an average of 30 persons per night utilized the program for sleeping. Additional persons used the program as a drop in service.</p> <p>Evaluation and learning following the completion of the Client Navigator Program helped to understand best practices in working with people experiencing chronic homelessness. Existing services within the Community Outreach team, the Homelessness Network and the Off The Street Low Barrier shelter were amended and coordinated to provide better supports directly to meet people where they were located and improve access to housing support.</p> <p>In 2017, with support of funding received from the Provincial Community Homelessness Prevention Initiative (CHPI):</p>	

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			<ul style="list-style-type: none"> 318 households who were homeless moved to permanent housing. 155 households moved from emergency shelter to long term housing. 1,018 households who were at risk of homelessness remained housed. 	
4	There is a need for additional supportive services coupled with permanent housing (both supportive housing and supports in private homes).	<p>Ensure the supports are available for individuals to achieve and maintain housing stability.</p> <p>Ensure adequate permanent housing linked with supports.</p> <p>Reduce barriers to accessing housing, services and supports.</p>	<p>The North East Local Health Integration Network (NELHIN) formed an expert panel to create the Innovative Housing with Health Supports Strategic Plan for Northeastern Ontario, 2016-2019.</p> <p>As part of the affordable housing strategy update, a workshop was held in March 2017 during a Development Liaison Advisory Committee meeting to discuss and receive feedback from the development community regarding barriers and opportunities to the development of affordable housing and potential collaboration with service providers.</p> <p>Planning Services has worked with local developers to increase affordable housing options.</p> <p>Ministry of Housing invited Service Managers to submit an expression of interest to define the supportive housing needs in the community; to inform the Ministry about the Service Manager's ability to deliver housing assistance and support services, and identify potential community partners to deliver supportive housing services. Housing Services partnered with Canadian Mental Health Association (CMHA), Health Sciences North (HSN) and North East Local Health Integration Network (NELHIN) to complete a Home for Good</p>	<p>As part of the affordable housing strategy update, a workshop was held in February 2018 during a Development Liaison Advisory Committee meeting to discuss and receive feedback from the development community regarding barriers and opportunities to the development of affordable housing and potential collaboration with service providers. A similar consultation meeting was held with a group of Service Providers in February 2018.</p> <p>Planning Services is continuing to work with local developers to increase affordable housing options.</p> <p>Through Ministry of Housing Home for Good Program Funding Year One, 200 Larch Street will undergo a capital renovation for a 15 bed residential Harm Reduction Home with support services on site. The support workers will include an Indigenous Social Worker, a Program Coordinator, an Addiction Worker and a Cleaning Support Worker.</p> <p>A site was identified for Home For Good Capital Funding Year Two, at 291 Lourdes Street, for the construction of a four-storey, 38 unit, affordable housing apartment building targeted for people in Greater Sudbury that fall within the province's priority</p>

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			<p>application. The Ministry has indicated an interest in supporting Service Managers across the Province to collaborate with other sector organizations (housing, health, community services, and children and youth sectors) to develop a coordinated supportive housing system with flexible approaches to meet people's changing needs, and to assist people to obtain and retain safe, affordable, and adequate housing with the appropriate level and type of support services. This program has a direct link to the Province's Long Term Affordable Housing Strategy Update issued in 2016 and supports the Ministry's goal to end chronic homelessness by 2025. Funding will be provided to Service Managers to assist recipients who fall within one or more of the provincial priority homelessness areas: chronic homelessness, youth homelessness, indigenous homelessness, and homelessness following transitions from provincially-funded institutions and service systems (i.e. hospitals and prisons). This is the first funding opportunity provided by the Ministry of Housing that includes both capital and operating funding.</p> <p>Several housing programs linked with supports operate in the community. In 2017, 373 individuals were assisted through supportive housing operated by the Canadian Mental Health Association and Monarch Recovery Services.</p>	<p>areas. The building will provide both shared and independent living for adults.</p>
5	There is a need to improve co-ordination, collaboration and partnerships among a broad range of stakeholders.	Improve effectiveness of the local housing system by increasing coordination, collaboration and partnerships among a broad range of stakeholders involved in housing.	CGS has developed an Affordable Housing Strategy, targeted to seniors and those who have low incomes, that focuses on innovative affordable housing options, the removal of barriers and consideration of incentives to their development and the utilization of surplus municipal property. In 2017, Planning, Social and	The City of Greater Sudbury will join the 20,000 Homes campaign, which is a national change movement led by the Canadian Alliance to End Homelessness. Joining the campaign provides resources and networking opportunities to develop a coordinated access system for person experiencing homelessness and an

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			<p>Housing Services have held four stakeholder meetings and have undertaken surveys targeting both the service providers and the development community.</p> <p>As indicated in #4, Housing Services has partnered with several key stakeholders regarding the Ministry of Housing Home for Good expression of interest that was completed in Spring 2017.</p> <p>In 2017 The Canadian Alliance to End Homelessness provided three days of Housing First Training to the Sudbury Community. Sessions were held with front line workers, community partners and stakeholders to develop an integrated system of support. As well an open public meeting was held to broaden the community understanding of Housing First.</p> <p>A Housing First Steering committee was established in 2017 to provide leadership towards an integrated system of support under the Housing First Model. Representation from a broad range of stakeholders is participating on the committee.</p>	<p>integrated system of support with a goal to ending chronic homelessness.</p> <p>In June 2018, CGS will hold 4 open house and 2 public meetings in respect of the draft Affordable Housing Community Improvement Plan and draft amendments to the Zoning By-law as part of the Affordable Housing Strategy.</p>
6	There is a need to monitor and report on progress towards meeting the Housing and Homelessness Plan objectives and targets.	Monitor, analyze and respond to information about the local housing and homelessness situation	Housing Services is a member of the Ministry of Housing -Housing and Homelessness Data Forum to collaborate with the Ministry and 47 Service Managers on the data strategy and identify a shared vision among the group to make housing and homelessness data more useful and meaningful. The Ministry has committed to building an evidence-informed system that has the capacity to respond effectively to changing needs. The Ministry has developed a Housing and Homelessness Data Strategy that seeks to guide the collection, management and use of relevant data, facilitate the collection of outcome-	<p>The 2017 Report Card on Homelessness will be released publically in July 2018.</p> <p>In March 2018 a homelessness enumeration (count) will be conducted within the City of Greater Sudbury. This enumeration is required by the Province of Ontario and requested by the Federal government to better understand the scale and nature of homelessness across Canada, as well as inform current and future policy development and program design. The final report will be made public in July 2018.</p>

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			<p>based data, enable strategic partnerships, and encourage an open culture of data collection, sharing and research.</p> <p>City of Greater Sudbury Social Services is participating in Municipal Benchmarking Network of Canada and is reporting on Emergency Hostels measures and Housing Services measures. Under Emergency Hostels , social services is reporting on:</p> <ul style="list-style-type: none">• the average length of stay per admission to an emergency shelter• the average number of emergency shelter beds available per 100,000 population• Average nightly bed occupancy rate of emergency shelters• Operating cost of emergency shelter program per 100,000 population <p>Housing Services is reporting on:</p> <ul style="list-style-type: none">• the number of persons who were placed annually from the Social Housing Registry Wait List• the number of social housing units per 1,000 households• the social housing administration operating cost per social housing unit• the social housing operating cost (administration)• the total number of households receiving housing allowance• the total number of rent supplement units within the service area <p>The 2016 Report card on Homelessness was released publically in August 2017.</p>	

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			CGS receives funding through the Provincial Community Homelessness Prevention Initiative (CHPI) and Federal Homelessness Partnering Strategy (HPS) and reports back to both levels of government on the required measures. The goals of these funding agreements are aligned with the priorities identified in the Plan.	