

**1916596 Ontario Ltd. – Application for rezoning to permit a recreation
and community centre in the form of a public arena and place of
amusement in the form of a casino, Kingsway,
Sudbury Comments**

**Comments received between February 9, 2018 @ 4:00 p.m. and March
16, 2018 @ 4:00 p.m.**

To those elected officials in power...

I think that it is shameful that the taxpayers of Greater Sudbury have not been solicited for their thoughts regarding a new arena. You are preparing to take us all for a ride down the path of arguably the largest public project this city has seen...but have neglected your responsibility of acting on behalf of your constituents.

Have you asked those that voted for you if they approve what you have approved? I know I haven't formally been asked. Are you afraid of the answer? Maybe. You asked the opinion of an expensive expert consultant and didn't act on that recommendation.

How much more of my money are you going to spend before asking my permission? Maybe a referendum is in order...?

Good luck at the next election...

Sent from my Samsung Galaxy smartphone.

I'd just like to say again that I oppose having a community arena next to a casino and for that matter, outside the downtown away from central transit and against all the efforts to revitalize our city centre.

There was no reason for this and it is harmful to the community in so many ways.

If the arena is too old and tired looking, it can be refurbished for less and kept downtown. See attached changes to St. Teresa School and it's new look as AMRIC.

We have many talented students and professors at the School of Architecture that could make this a made-in-Sudbury solution.

The 2100 parking spots will contribute pollutants to Ramsey Lake regardless of the stormwater management pond, which are known to be generally useless when a large rain event occurs and flushes contaminates downstream. These ponds also need proper maintenance to function properly which will be an unending expense to the city.

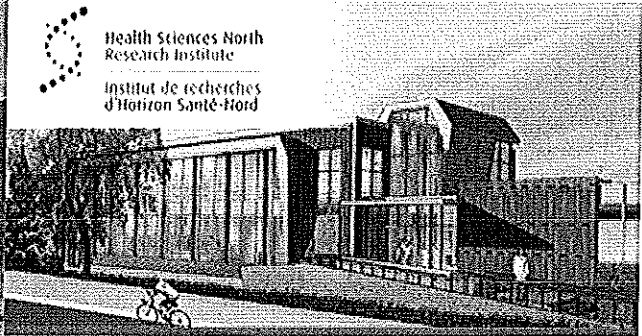
And although we've heard assurances from the casino/city that only sand/brine will be used in the parking lot, salt will still be used on the many walkways and it will all head straight to the lake. I also believe we are setting the city up for failure by approving this rezoning as this proposed parking lot looks to be the future location of a snow dump, which is not permitted in the Ramsey Lake Issues Contributing Area according to the Source Protection Plan.

In keeping with subsections 17(35) and 51(37) of the Planning Act, I would like to receive notice of any decision of Council related to this development proposal.

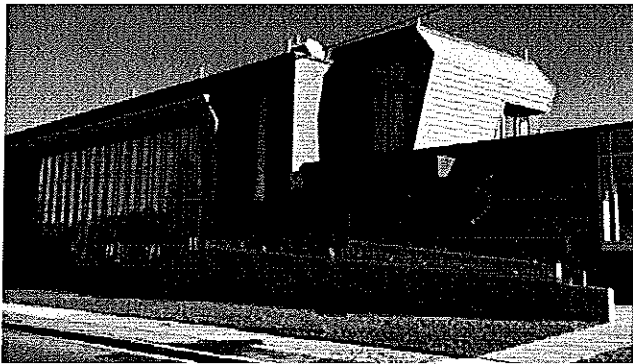
Thank you,

Lilly Noble

[REDACTED]
[REDACTED]
[REDACTED]



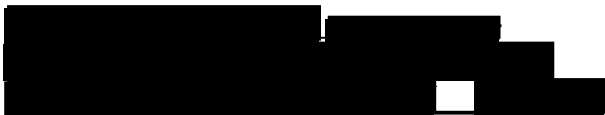
Health Sciences North
Research Institute
Institut de recherches
d'Horizon Santé-Nord



John,

I, too, thought Michael's column deserves widespread circulation and attention by all citizens of Sudbury. It is so well written with great clarity and logic. I will be referring it to many friends and colleagues, although in most cases I know we'll be preaching to the converted.

Art Peach



On Feb 11, 2018, at 12:49 PM, John Lindsay

wrote:

**Opinion piece by Michael Atkins, President of Northern Ontario
Business Feb. 7th 2018**

I have known Michael Atkins for years from the time he acquired a struggling local weekly paper to owning successfully businesses elsewhere in Canada. You can't help but respect this individual who has shown an entrepreneurship spirit that has benefited our community and many others. In talking to Michael you discover just how much he truly loves our city but has severe reservations as to the direction we are headed with respect to the development of a new arena and casino. I believe in listening and learning from those who have a good track record of success and can see clearly what makes sense and what can provide the greatest benefit and also those initiatives that may be questionable. Below is the second of two excellent opinion pieces that Michael has written on this important subject. All concerned should take note. My thoughts follow those of Michael ---- John Lindsay

"The debate rages on in Sudbury about the propriety of ripping an arena out of the downtown and twinning it with a casino on an industrial land site five kilometres away.

The stakes are high: high for the developer who gets to revalue their land near the city dump, which has been doing nothing for decades; high for the city, which has ignored virtually all of its professional advice internal and external on the matter, including its own official plan and which will undoubtedly face legal scrutiny in due course; high for city councillors who are locked into fixed positions notwithstanding the extraordinary peculiarity of making this decision as the result of a six-to-six tie vote when it was brought before council; high for the province who through the OLG is determined to suck funds out of every midsize community it can tap across Ontario; high for downtown business owners who may have made investments based on the official plan of the city which specifically said it would not move the arena out of the downtown; high for environmentalists

who are deeply concerned about the impact on the watershed of Ramsey Lake where tens of thousands of people get their drinking water; high for activists who are horrified the community arena designed for family fun is set across a square from a casino where the restaurants will be located; and high for taxpayers who are going to have to pay for this debacle for the next 50 years. There are other stakeholders, from transit aficionados to poverty activists, but you get the drift.

It appears to be a fight to the finish. There is no middle ground. You are for it or you are against it. It's either ridiculous to introduce a casino into a market with limited gambling tourism upside or not. It is either ridiculous to add tens of thousands of tons of salt to your drinking water source or it is not. It is either economically absurd in a static market to create two competing nodes of entertainment or it is not. It is either ridiculous to spend more than \$100 million of public funds on all this infrastructure duplication or it is not. It is either ridiculous for the city to ignore virtually all of its professional advice or it is not. It is ridiculous to worry about all this stuff when you get a new casino and a new arena and all the benefits that are claimed to accrue.

As anyone in the North knows, this is painful. We live together, we party together, we volunteer together, we worship together, many of us play sports together and, notwithstanding the minimum wage hikes, we still go to Timmy's together.

We have a weekly newspaper in Sudbury (Northern Life) and a website (Sudbury.com). The arguments and emotions come in waves through our media, and it is hard on our staff. Someone is always upset with us. Of course, that's our job, but it doesn't make it any easier.

Not long ago, some 40 people showed up at a city planning committee meeting where 95 per cent opposed the development. The arguments were strong, passionate and cogent.

It is hard to fully appreciate the depths of emotion.

With a provincial election coming, you can expect the Liberals or Gateway Casino to announce more money for this boondoggle. Maybe it will be a gas plant – more likely a soccer pitch – and you can rest assured the developer will be paid well for their newly valued land around this public investment. This is chump change for the province to make sure Sudburians get addicted to sending more money to Queen's Park every year.

Most development projects in Northern Ontario communities create unity and positive vibrations. In fact, one of the most exhilarating qualities of living in the North is that citizens matter. Everyone is needed to overcome the vicissitudes of a resource economy that is one day giving too much and

the next day breaking your heart. Fighting for fairness, equal treatment and innovative solutions makes us strong and resourceful.

When it goes awry it has a magnifying effect on the soul of the city and not for the better.

It will be up to future generations to put Humpty Dumpty back together again in Sudbury. The question is what will be the real cost”.

Michael Atkins

My thoughts are not mine alone but are the results of a public meeting with seniors and other aged citizens in December.

- 1. Keep the present arena with possible upgrades*
- 2. Keep the present downtown library*
- 3. Keep slots in Chelmsford with no expansion gaming activity – no Casino*
- 4. Possibly move Art gallery to Rainbow Centre*
- 5. Restore Bell Mansion as a museum and tourist attraction.*
- 6. Keep property taxes close to rate of inflation.*
- 7. Fix our crumbling infrastructure before new roads and special projects requiring capital costs and ongoing operation and maintenance..*
- 8. Improve our environment - cleaner water – safer roads – parks – leisure activity facilities not just static spectator sites.*

Good morning,

Can you please include Mr. Haddow's comments with the other comments already received by Clerks Services?

Thanks

Ryan

>>> Harry Haddow
ARENA

2/6/2018 9:13 AM >>>

We've exchanged thoughts and sentiments about this subject once before.

I realize the wheels are in motion, and there is significant investment activity from near and far being sought to make the Kingsway location a reality.

It seems as though wisdom and important long-term benefits for all Sudbury is being set aside for the financial windfall of a relative few.

Have you had one-on-one discussions with other cities who have done what Sudbury is about to do?

Ottawa, Phoenix and others.

It is not a success formula!

I hope and pray you and your inner circle, are people of impeccable integrity...when "no else is watching".

Situational ethics, means we have no ethics.

A location like Notre Dame and Kathleen perfectly describes what this City is all about.

The end of Kingsway is gonna tear this City apart - don't let it be your legacy Mr. Mayor.

Downtown Vancouver is a perfect example of what Im trying to convey. The early proponent of what is now a world wide example of successful urban re development - had his character assassinated...today he is being celebrated.

If a casino is necessary to have, such a facility could pretty much be located anywhere and they will come.

What you are embarking on is a huge experiment, and that has already been tried in many other locations - with distasteful results.

Respectfully,
Harry Haddow

Can you please include the comments below with the others received to date regarding the arena/event centre project?

>>> Arlene Sukey

2/9/2018 7:43 AM >>>

I hope YOU MAYOR BIGGER have some time to read this and share it with city councillors and re visit this costly endeavour to us the tax payer!

<http://www.thesudburystar.com/2018/02/07/saults-arenaevents-centre-to-lose-626000-in-2018>

Sent from my iPad

Taken from my public facebook post, Jan 23, 2018:

I would like to go on the public record to say that I do not and will not support the Kingsway Casino in Sudbury.

Wondering why the residents in Sudbury don't even get the right to vote on whether we want, or even need, a casino. We don't.

Casinos bankrupt vulnerable people, destroy families, and don't create lasting employment. They decimate communities and bring advantages to the people who reap in the rewards (aka the management and in this case, a private company).

A percentage comes back to the city, a very small percentage (5%). Far too much of the plan for this event centre (call a spade a spade = secret casino) is going to line the pockets of a few individuals that already have a large part of the pie of Sudbury.

How many more of the Sudbury elite will continue to (or try to) get rich off this project? Can any more people be in conflict of interest on this? It's pretty deep. You know who you are.

How can multiple project(s) that have been in the works much longer than the Kingsway Secret Casino be put on hold, while this project, that is very poorly planned, gets fast track advantages?

EG: Why isn't the Elgin Greenway or the Place des Arts given the same advantages as this project? This project we don't even have the funds to pay for? This land that has no infrastructure on it? This project that will destroy an eco system and thousands of trees?

Something really stinks at Sudbury City Hall. And at the City of Sudbury Chamber of Commerce, where several members have already left the org because they were told they weren't "allowed" to publicly oppose the project.

Super. Shady. Backroom. Politics. 1% style.

All I'm calling for is accountability in the City of Greater Sudbury for the responsibility of managing public funds - and - the due process owed to the community.

I applaud the efforts of Andre Dumais and Mark Signoretti for getting the facts out there - with the REAL math - not the spun stories that favour this project unfairly.

Thanks to CBC Sudbury, Markus Schwabe & Erik White and all other journalists in the area that continue to cover this story from the perspective of the people who will have to pay the \$100M for this monster event centre to be built & sustained. We did not vote for this. We do not want this.

<http://www.thesudburystar.com/.../column-sudbury-being-sold-d...>

#secretcasino #corruptsudbury #therichwininsudbury#kingswaysecretcasino #truenorthwrongcentre
#kingswaysprawl#badurbanplanning #justsaynotodarioland #darioland

Heather K. Dahlstrom

[REDACTED]

From: Serge Miville
To: <clerks@greatersudbury.ca>
Date: 3/12/2018 9:27 PM
Subject: Kingsway Event Centre Question

Hello,

I currently have one main question ahead of the Kingsway Event District Rezoning public hearing.

Firstly, has there been any costing as to how much public money will have to go into building and maintaining new infrastructure and bus services in the proposed area for the next thirty years? Does the planning committee have any information regarding this and how this will impact the tax burden so far?

Best,

Serge Miville



My whole household is in favour of the Kingsway Development even though we may live in the downtown. The entire city of Sudbury is benefiting from the Kingsway Development whereas only the downtown would really benefit from a new arena and potentially a hotel in the downtown area. The Kingsway Development is the best investment for our city.

Kurtis Kulik

Let's get the rezoning approved please and get shovels in the ground on this project. So tired of the downtowners flogging their losing turf.

Linda Makela



Committee

First and foremost lets not make the mistake and make this event center too small, less than 6,500 seats, for ice events like Memorial Cups, Briers, Tournament of Hearts, Skate Canada Nationals, CIS national events and awards shows are the minimum to get these events today.

As we have seen Windsor, Sault and North Bay has been a tough time getting events for their new arenas. All have tried for Brier but come back too small. As these events are looking for seating more than 5,500 seats these venues have. As these events are looking for arenas of 6,500 to 10,000 seats, for profitability of these events.

So we need to remember, think about how we Hosted one of the best Briers of its time, and Tournament of Hearts, but when tried again facility too small, the city of Kingston is bidding on the 2020 Brier, K-Rock seat 5,600 fans and they know they will have a tough time, recent Brandt Centre hosted the Brier and capacity is just 6,500 + 35 executive suites.

Lets not make the same mistakes of the past Grace Heartman too small, countryside arena should have been a multi pad from get go, James Jerome fields too small to hold Senior football, players at risk for injury due to layout of fence of bleachers.

Let do it right from the start 6,500-7,500 seating for hockey ice event and 8,500 for concerts.

This will make venue attractive to events likely to make money for the city.

G Connor



Sent from Windows Mail

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Thank you
Mary-Anne Boulet

[REDACTED]
[REDACTED]

To: clerks@greatersudbury.ca

Subject: I SUPPORT LOCATING ARENA & CASINO AT TNS

To the True North Strong (Kingsway Entertainment District) Planning Committee.

I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Thank you.

Tracey Brown

[REDACTED]
[REDACTED]
[REDACTED]

Good morning, I am absolutely in support of the re-zoning on the property for the new arena /casino. As a business owner and life long resident of this city I pay both commercial property tax and residential property tax. I welcome this change in an effort to move our city forward.

Take care,

Carl Young

[REDACTED]

[REDACTED]



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Chris Kutchaw

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Sincerely,

Tracy Billard
Resident and tax payer of city of greater Sudbury

Hello

Please be advised I live in Sudbury [REDACTED] [REDACTED] These are my comments re the rezoning of land on the Kingsway for the new arena/casino etc. as I will be unable to attend the public meeting later this month.

I strongly support the rezoning to allow for the arena etc. to be built on The Kingsway. In fact when you look at the land and its location it is a waste of my tax money to have City Staff go through the process. Why does the system force The City to move at the speed of molasses on so many things.?

Mick Throssell

From: marc repele
To: "clerks@greatersudbury.ca" <clerks@greatersudbury.ca>
Date: 3/13/2018 7:45 PM
Subject: I support locating areas and casino at TNS

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Marc Repele [REDACTED]
[REDACTED]

From: Mike Chezzi
To: <clerks@greatersudbury.ca>
Date: 3/13/2018 10:08 PM
Subject: I SUPPORT LOCATING ARENA & CASINO AT TNS

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Mike Chezzi

To: clerks@greatersudbury.ca

Subject: I SUPPORT LOCATING ARENA & CASINO AT TNS

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I can't believe this is still being debated. People need to move on and allow Sudbury to progress into the future!!

Sue Ballance

Please forward this message to the necessary persons.

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It's time for Sudbury to move forward.

Best Regards

Lois Lavoie

[REDACTED]

[REDACTED]

From: Linda
To: <clerks@greatersudbury.ca>
Date: 3/14/2018 10:02 AM
Subject: Expansion on the Kingsway

I am in favour of the construction for the convention centre and the casino on the Kingsway. It will help the economy of Sudbury. We need all the jobs we can get to keep the population from moving south.

Linda Danis,


GORDON E. PETCH

- Barrister -

REAL ESTATE DEVELOPMENT | MUNICIPAL LAW | ENVIRONMENTAL LAW

March 12, 2018

VIA EMAIL eric.labell@greatersudbury.ca

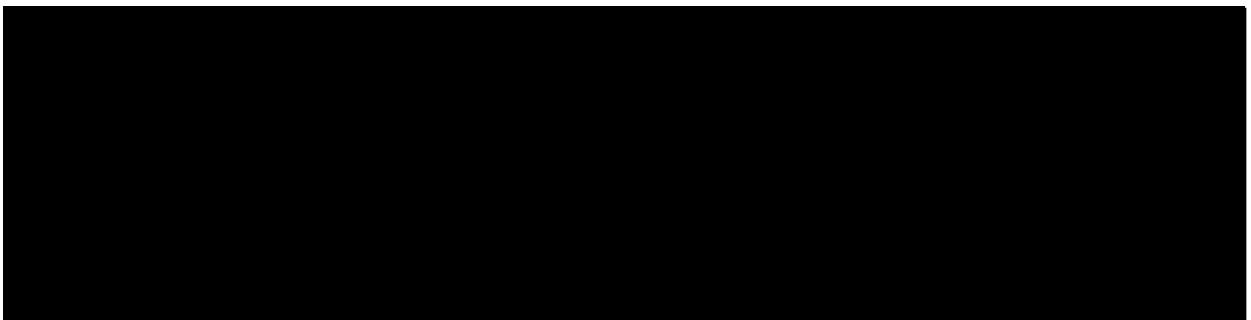
Mayor Bigger and Members of City Council
200 Brady Street, 2nd Floor
Tom Davies Square
Sudbury, ON
P3A 5P3

Your Worship Mayor Bigger and Members of Council,

Re: Proposed Kingsway Entertainment District and Arena Event Centre

I am retained by the 'Downtown Sudbury' BIA and Mr. Tom Fortin with regard to the above Planning Act applications which I understand are scheduled to be considered later this month. My clients have retained Mr. Rowan Faludi of urbanMetrics Inc. to undertake a preliminary economic impact study of the said proposals as well as Mr. Robert Dragicevic of WND Planning to provide a planning opinion. Mr. Faludi's report is attached hereto. You will note that Mr. Faludi has many years of experience studying the casino/gambling industry as well studying the economic issues related to Ontario Downtowns.

Mr. Faludi's report speaks to the dire long term economic consequences on the Downtown, firstly for relocating the existing Greater Sudbury Community Arena outside of the Downtown and then secondly, and further compounding the problem, by combining it with the proposed Casino/Hotel/Convention complex. Mr. Faludi also advises that there is no real net financial revenue or job increase advantage for City with the proposed Kingsway development. Given the seriousness of these issues I wanted to provide his report to you prior to the Planning Committee Meetings.



I will file Mr. Dragicevic's Report and will have further submissions to make prior to the Planning Committee meeting.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Gordon E. Petch". The signature is fluid and cursive, with a large initial 'G' and a distinct 'P'.

Gordon E. Petch
GEP/dh

Encl.

cc. 'Downtown Sudbury' BIA
Tom Fortin



KINGSWAY ENTERTAINMENT DISTRICT AND ARENA

Economic and Financial Analysis

Sudbury, Ontario

Prepared for **Municipal Law Chambers**

March 12, 2018



March 12, 2018

Mr. Gord Petch

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear Mr. Petch:

Kingsway Entertainment District and Arena Economic and Financial Analysis

As per our discussions, you have asked urbanMetrics to prepare a preliminary report summarizing our initial analysis and conclusions with regards to the proposed Kingsway Entertainment District in Sudbury and the proposed relocation of the Sudbury Community Arena, as part of this proposed arena/casino/entertainment/retail centre on the north side of The Kingsway in the vicinity of Levesque Street.

As you are aware, our firm, and our legacy organizations: the Coopers & Lybrand Real Estate Consulting Group and the PricewaterhouseCoopers (PwC) Real Estate Advisory Services Practice, have extensive experience in terms of analyzing the need for sports and entertainment complexes as well as casino gaming. In addition, we have undertaken numerous studies on behalf of municipalities to assist them in planning their commercial structures and downtown cores. We were involved in the analysis that led to the initial introduction of casino gaming in Ontario, and have continued to analyze casino and gaming projects on behalf of both private and public-sector clients. We have also undertaken numerous downtown studies on behalf of municipalities, and recently, on behalf of the Downtown Peterborough BIA undertook an analysis of a similar type of casino proposal. Moreover, we are also able to provide considerable insights into the Sudbury market and tourist draw, having been the economic consultants to Science North on a number of occasions and assisted in the creation of the Dynamic Earth attraction.

As part of our analysis, we have undertaken a review of the background documentation, including two PwC reports, which reviewed various options for the arena/entertainment complex, developed locational criteria and applied those criteria to provide Council with

direction as to an appropriate site for a new arena. We have also reviewed various planning policy documents, although we would note that the focus of our analysis relates largely to the market and economic impacts related to the arena and the impacts that might occur with the relocation of the arena and the casino to the proposed Kingsway Entertainment District.

The following report summarizes our principal conclusions and supporting analysis related to the proposed Entertainment complex.

If you have any questions with regards to any aspect of our report, please do not hesitate to contact us.

Yours truly,

urbanMetrics inc.



Rowan Faludi, MCIP, RPP, CMC, PLE
Partner
rfaludi@urbanMetrics.ca

Summary of Findings

We have undertaken a preliminary assessment of the principal components of the proposed Kingsway Entertainment District, and particularly, the proposed relocation of Sudbury Community Arena and the proposed relocation of Gateway Casinos Sudbury.

In our opinion, the proposed Kingsway Entertainment District would be contrary to a number of key municipal and Provincial policies, including the Official Plan, the Downtown Master Plan, the Economic Development Strategy and the Growth Plan for Northern Ontario.

Our analysis also concludes that the Kingsway Entertainment District is not a project that would make economic sense for the City of Greater Sudbury in that the benefits it would produce would be overshadowed by its economic and financial costs. Before investing further staff and financial resources in this project, we strongly recommend that the City proceed with the conduct of an independent economic and financial analysis of this project.

- **Downtown Sudbury is the City's and Region's Commercial Engine.** This is reflected in all of the City's key Planning and Economic Development policies. These policies protect Downtown Sudbury and actively promote continued investment in the core. The Sudbury Community Arena is the largest visitor attraction to Downtown Sudbury and supports many downtown businesses. The relocation of the Sudbury Community Arena would be a lasting economic drain on Downtown Sudbury. It would likely cause the direct loss of businesses that rely on the arena and would significantly hamper the attraction of new investment to downtown Sudbury
- **Downtown's are the Preferred Location for Major Arena/Entertainment Complexes.** Major sports leagues including the NHL and CHL have recognized that their most successful franchises are in downtown locations, while the least successful franchises are on suburban sites. Municipalities, such as London, Kingston, Guelph, St. Catharines, Oshawa, and others, with downtown CHL arenas are seeing a surge in commercial and residential investment. The development of a new arena in Downtown Sudbury, would help to stimulate private investment in this strategic area.
- **The PwC Report Confirmed Downtown as the Preferred Site for the New Arena.** PwC was engaged by the City of Greater Sudbury to undertake two reports examining the need for and the location for a new Arena/Entertainment complex. After examining eight key factors, PwC concluded that the Downtown was the preferred site for the Arena.

- **Making a Decision Based on a Sub-set of the PwC Factors is a Flawed Approach.** Council directed PwC to make an assessment based on only three of the factors – Economic Impact, Cost, and Parking. While the Downtown site was rated highest from an economic impact perspective, it was rated behind the Kingsway site in terms of Cost and Parking. PwC used very generalized and preliminary cost information and, in our opinion, did not have sufficient information to rank the options based on cost in a supportable manner. The parking analysis left out a number of key factors that could have returned an alternative result if considered. Furthermore, it was based on a pre-existing bias that an expansive suburban parking area was in someway superior to downtown parking options, without taking into consideration the amount of parking actually required to support a new arena. The analysis using only three of the eight factors is a flawed approach and should not take precedence over the analysis of the full range of factors, which resulted in the Downtown being the preferred location for the arena/entertainment complex.
- **The Kingsway Entertainment District Would Redirect Business and Investment Away from Other Parts of Sudbury.** The current Kingsway proposal would include the relocated casino, the relocated arena, as well as, restaurants, and other recreation/entertainment uses and is also being promoted to include shops and a convention centre. Sudbury is not a large market and is projected to grow at only modest levels. In the absence of a major draw in the downtown to replace the arena, it is likely that the Kingsway Entertainment district could exist only by cannibalizing business from the downtown and other parts of the City, which are already identified in the Official Plan as being important commercial nodes the entire City and beyond.
- **The Kingsway Proposal Would Jeopardize the City’s Planned Transformational Large Projects.** Following a public consultation process, City Council gave direction to proceed with two major projects – The Greater Sudbury Convention and Performance Centre and the Library/Art Gallery. The re-use of the existing arena was deemed the preferable location. In our opinion, it is likely that the proposed Kingsway Entertainment Centre could duplicate the function of the convention centre and events centre – by offering alternative performance venues, meeting spaces and convention facilities. In addition, by relocating the arena to the Kingsway site, the City would be losing all of the synergies that would exist between the convention centre and the arena, such as, attracting large scale events that would use both facilities, or by attracting a large convention hotel that could serve both arena and convention centre. In our opinion, the Kingsway development would seriously impact the viability of these important projects in the downtown core. And in fact, the

Kingsway development is already being promoted for a convention centre to tie into the opportunities created by the relocated arena¹.

- A Casino Would Not Significantly Affect Tourism to Sudbury and Would Draw the Vast Majority of Its Support from within the City.** The existing Sudbury tourism market is not large and not well oriented towards casino gaming, with about 70% of visitors coming to visit friends and relatives or for shopping and personal appointments. About 60% of visitors arrive from other parts of Northern Ontario. The current pleasure market comprises only about 21% of visits. The existing casinos in Northern Ontario – in Thunder Bay and Sault Ste. Marie draw between 85% to 95% of their visitors from within the local municipality. Licence plate surveys conducted at the Gateway Casino Sudbury (Former OLG Slots), confirm that the vast majority of customers are from Sudbury. Attracting tourists to a casino in Sudbury would require tapping into new markets not currently visiting Sudbury. This would be difficult to do because the Provincial and International gaming markets are already severely constrained by existing casinos, while the OLG modernization program will be bolstering this competition. In our opinion, additional gaming revenues that would be achieved by a new casino in Sudbury would be derived mostly from Sudbury residents, who would have transferred their spending from other commercial sectors elsewhere in the City.
- Casino Gaming Extracts Money from the Local Economy.** Casinos and slots facilities typically generate very high profits. In the case of the OLG Slots, this facility generated approximately \$42 million in net gaming revenues in 2016/17, plus a small amount in food services. Local costs (wages and salaries, municipal revenue share, sponsorships, local purchases, etc.) comprised only about \$12 million. The OLG Slots Sudbury facility contributed approximately \$30 million to the Province. With the vast majority of these revenues being derived from Sudbury residents, an estimated \$20 to \$24 million was effectively transferred from the City's economy to the Province. While the Province invested money back into the City as part of its ongoing spending on health care, transportation, infrastructure, etc., there is no way of knowing whether this represents a gain or a loss for the City, or whether the Province would invest any differently if there were not casino in Sudbury. Effectively this money was being transferred from the City for discretionary spending by the Province. This situation will be less favourable for Sudbury going forward, in that future casino revenues will be shared

¹ Promotional video prepared by True North Strong Centre.

² Science North is made up of multiple separate attractions including the Science Centre, Dynamic Earth, the

between the Province and Gateway Casinos – a private BC company owned by a Toronto Investment firm, which would have no obligation to invest revenues back into the local economy.

- The Proposed Kingsway Entertainment District May Not Result in a Significant Number of New Jobs for the City.** While the proposed entertainment district will be a relatively large employer, most of the jobs will occur from transferring existing jobs from the arena and the slots facility. The employment gain from the new arena would be negligible and would likely be the same if the arena were constructed downtown. Gateway Casinos has announced that it will employ some 400 persons. These would replace approximately 190 jobs at the slots site. Based on our understanding of the Gateway concept, about two-thirds of these employees would be required for work in food services and retail outlets at the casino. It is likely, that at least some of these jobs will be transferred from existing bars and restaurants in the downtown and elsewhere in Sudbury, so that the net gain could be relatively small. Equally as important, is that due to their high profits, casinos do not generate a lot of employment per dollar earned. So that transferring revenues from establishments such as restaurants that require more staff per revenue earned, could actually result in employment losses for the City as a whole.
- Additional Revenues to the City from the Proposed Kingsway Entertainment Project May Not Be Significant.** The City currently receives about \$2.2 million from the current slots facility through the Municipal Contribution Agreement with OLG. Based on a projected casino win from a current level of \$42 million from the slots to between \$75 and \$80 million from both tables and slots, this would increase the municipal share by between \$1.45 to \$1.7 million. Additional revenues would also be available from property taxes, however, these will be highly dependent on assessment changes that are being reviewed by the Municipal Property Assessment Corporation in response to the OLG modernization program. These would result more from changes to how casinos are assessed than to where they are located. In other words, the assessed value of the facility will likely change regardless of whether Gateway Casinos moves to a new location. As a municipal facility, the Community Arena, is exempt from taxes. This is not expected to change with the proposed relocation to the Kingsway site. These net revenue gains will also be tempered by tax losses from the closure or downsizing of downtown businesses due to the relocation of the arena and competition from the proposed Kingsway development. Furthermore, taxes received from new development also come with a requirement for a municipality to provide public services, such as road maintenance, emergency services, administrative

services, etc. So that much of the tax increase from the development of a new casino may be required to provide the necessary services to support it.

- **In conclusion, the Proposed Kingsway Entertainment District has many Economic Drawbacks for the City and it is likely that its Economic and Financial Costs would Outweigh its Benefits.** As a result, we would strongly recommend that a more detailed economic analysis be undertaken, before additional staff and financial resources are invested by the City towards this proposal.

1.0 Sudbury Community Arena is an Important Economic Driver and Community Resource

Sudbury Community Arena is currently one of the largest visitor attractions within the City and an important economic driver for the downtown core.

Based on the February 21, 2017 PwC Report, which was commissioned by the City to assess the viability of constructing a larger and modernized facility, between 2013 and 2015, the current arena has drawn between 156,000 and 213,000 visitors annually. To put this in perspective, this is more than the attendance attracted to the Science North Science Centre over this period, which drew between 142,000 to 149,000 visitors². While the source of visitation to these two important attractions is very different, none the less, Sudbury Community Arena draws a very significant volume.

The City of Greater Sudbury's website describes the Sudbury Community Arena:

The Sudbury Community Arena is where sports and entertainment come alive in the north! A hub of community activity since 1951, the Sudbury Community Arena has hosted countless concerts, tradeshow and sporting, entertainment and cultural events. It is also proud home to the Ontario Hockey League's Sudbury Wolves. Centrally located in downtown Sudbury, the Sudbury Community Arena is situated near a variety of unique shopping, entertaining and dining locations³.

As one of the most visited attractions in the City, Sudbury Community Arena attracts many visitors to the site, but also supports a wide range of businesses in its vicinity, including restaurants, retail shops, accommodations, and others.

In our experience, the location of the arena will play a very significant role in terms of its ability to support local businesses and attract visitors to its own events.

² Science North is made up of multiple separate attractions including the Science Centre, Dynamic Earth, the Exhibit Hall, the IMAX Theatre, the Planetarium and the new Escape Room. All of these attractions combined drew between 343,000 and 381,000 persons between 2013 and 2015. The Science Centre is the most popular of these attractions, drawing between 142,000 and 149,000 visitors.

³ <https://www.greatersudbury.ca/play/recreational-facilities/arenas/sudbury-community-arena/>

2.0 Downtowns have Become the Preferred Location for Major Arena/Entertainment Complexes

Both municipalities and sports organizations across North America have realized that suburban-based arenas consistently underperform those in downtown locations, both in terms of economic impacts and attendance.

The National Hockey League has acknowledged the trend towards successful downtown arenas, citing young people's preference to living downtown and forgoing car ownership and that from an urban planning perspective the trend is moving away from suburban entertainment districts towards a more dynamic mixed-use approach, including residential development and retailing. The weakest franchises in terms of attendance - Florida, New Jersey, Arizona, Carolina and Ottawa are those with NHL arenas in suburban locations⁴.

The Edmonton Oilers recently relocated from the former Northlands Coliseum (Rexall Place) beside the Northlands exhibition grounds (i.e. an entertainment district), to Rogers Place in the heart of the downtown core. The construction of the new arena has attracted a downtown building boom characterised by a number of new condominium and office projects. The City of Ottawa is also considering a relocation of its NHL arena from suburban Kanata to LeBreton Flats adjacent to the downtown core. NHL Commissioner Gary Bettman has stated that "A new downtown arena is vitally important to the long-term future, stability and competitiveness of the Senators"⁵.

Smaller communities with Canadian Hockey League (CHL) teams are also moving towards downtown arenas. The London Knights, which has the highest average attendance in the Ontario Hockey League (OHL) and the second highest in the CHL has their home in Budweiser Gardens – an important downtown attraction, which like Edmonton has also attracted considerable downtown investment since its opening in 2002. The City with the highest average attendance in the CHL is Quebec City, which has an arena on the fringe of its downtown.

Similarly, the K-Rock Centre in downtown Kingston has become a key economic driver for the core area, hosting the Kingston Frontenacs OHL team and a myriad of major concerts and events. To enhance the economic impacts of the arena, it was designed so

⁴ "Suburban arenas a problem for the NHL", Toronto Star, November 23, 2107.

https://www.thestar.com/sports/breakaway_blog/2017/11/23/suburban-arenas-a-problem-for-nhl.html

⁵ "NHL commissioner Gary Bettman says Ottawa Senators need a new home", Ottawa Sun, November 10, 2017.

<http://ottawasun.com/sports/hockey/nhl/ottawa-senators/bettman-says-the-senators-need-a-new-home>

as not to offer on-site destination parking to ensure that patrons would pass by shops and restaurants throughout the downtown core on their way to the venue.

Other Ontario cities that have developed successful arenas in their downtown cores include: Guelph (Sleeman Centre), St. Catharines (Meridian Centre), and Oshawa (Tribute Communities Centre). While the recently renovated TD Place arena – home to the Ottawa 67s – is not in the downtown core, it is situated within the historic Glebe neighbourhood and Bank Street commercial avenue. Together with the development of the TD Place stadium, this major redevelopment project has helped to attract extensive commercial and residential development to this historic area of Ottawa.

The existing Sudbury Arena attracts over 150,000 to 200,000 persons to the downtown each year and hosts events that could not be accommodated elsewhere in the City. The City of Greater Sudbury Official Plan recognizes that amenities such as ... Sudbury Arena ... contribute to the appeal of downtown” and as a stated program indicates that “In order to make it more attractive as a place of residence, additional amenities necessary to enhance the liveability of the Downtown will be identified”⁶. In other words, the Official Plan is seeking to increase the number of amenities like the Arena to locate in the downtown core.

In summary, the trend in both the NHL and the CHL is towards downtown arenas for several reasons:

- They tend to draw higher attendance than suburban arenas;
- There is an emerging market with lower rates of car ownership and a propensity to live downtown;
- From an economic development perspective, downtown arenas are more successful at attracting new residential, office, entertainment, and commercial development than their suburban counterparts; and,
- From a planning policy perspective, downtown arena sites support a more efficient, transit and pedestrian urban structure than suburban arenas.

The proposed entertainment complex on the Kingsway would be counter to these trends and appears to ignore the positive economic impacts of downtown arenas that are being experienced by cities both large and small.

⁶ City of Greater Sudbury Official Plan Section 4.2.1.1 Program 1.

3.0 The Kingsway Proposal is Inconsistent with the City's Policies Protecting and Enhancing the Downtown as the Engine of the Region's Commercial Economy

Downtown Sudbury is the centre of retail, arts and culture, government and business services for not only the City, but also Sudbury's extensive service area. Based on data compiled by the Canadian Urban Institute⁷, Downtown Sudbury accommodates some 400 businesses and 6,000 employees. Downtown Sudbury is home to some of the City's leading institutions, including: the Laurentian School of Architecture, City Hall, Memorial Park, the YMCA and Older Adult Centre, the Sudbury Theatre Centre, and Sudbury Arena, among many others.

Sudbury Official Plan

The Official Plan contains numerous references to the importance of the downtown to the City and its service area, and contains policies to sustain and attract new investment to this vital part of Sudbury's urban structure.

For example, Section 1.4 cites the importance of the downtown to the community; the need to enhance its role; and the need to attract new residential development to the core:

The heart of Greater Sudbury, its most urban place, is and will be the Downtown. With the changing role of downtowns, there is a continuing need for appropriate policies and programs to enhance the Downtown as a location of government, commerce, cultural and entertainment facilities. Residential development in and around the Downtown is needed to support new and expanded facilities and amenities.

Section 1.2 directs the City to sustain the downtown as a vibrant hub:

Greater Sudbury's Downtown will be developed and sustained as the vibrant hub of a dynamic city by preserving its historical built form, promoting arts and culture, improving linkages to neighbourhoods and amenities, integrating natural features, developing residential uses, and creating unique urban spaces through innovative design.

⁷ The Value of Investing in Northern Ontario Downtowns: The City of Greater Sudbury Case Study, August 19, 2014.

To this end, Policy 1 in Section 4.2.1.2 requires the City to preserve those aspects of the downtown that contribute to the image, character and quality of life of the City.

It is policy of this Plan to preserve those aspects of the Downtown that contribute to the image, character and quality of life in the City, including natural features, landmarks, design attributes, heritage resources, linkages to existing trails, pedestrian walkways and other desirable elements of the built environment.

In summary, the downtown is a key part of the Sudbury economy. Although the mining and smelting industry has, in the past, been the economic driver of the City, Sudbury is diversifying its economic base, which has been characterised by growth in banking and financial services, business services, government, tourism, health care and retailing. The PwC reports confirm the recent emergence and recognition of Greater Sudbury as a centre for research and innovation with growth in various information technology sectors (e.g., science and technology research)⁸. This recent growth also includes direct partnerships with local post-secondary institutions. The addition of the Laurentian School of Architecture is a prime example of this diversification and the attractiveness of a downtown environment for these creative and technology intensive sectors.

These types of activities are much more urban in character than Sudbury's traditional industries. A vibrant downtown with a mix of entertainment, shopping, residential and business opportunities will be important in terms of attracting businesses and employees from these sectors.

Across North America, downtown cores are playing a key role in terms of establishing cities as quality places that can attract the emerging workforce required for the creative economy.

From the Ground Up 2015 – 2025

Sudbury's Economic Development Strategy prepared by the City of Greater Sudbury Community Development Corporation entitled From the Ground Up 2015 -2025, makes extensive reference to the downtown as a key driver of Sudbury's economic future.

Greater Sudbury recognizes that downtowns are important and that they represent the historic and symbolic heart of the community. A healthy, active, successful

⁸ PricewaterhouseCoopers, Proposed Sports and Entertainment Centre Feasibility and Business Case Assessment, February 21, 2017. p. 6.

downtown makes a positive statement about the prosperity of the city and sends a positive message to future residents, businesses and investors.⁹

The revitalization and development of Downtown Sudbury is a key objective of the City's Economic Development Strategy. Objective 4.1 of the Strategy is to "Revitalize and Redevelop Downtown Sudbury as a key indicator of the Community's Quality of Place". The "Required Actions" to achieve this objective include: attracting investment in retail, arts, food, and hospitality; implementing a business retention and expansion program targeting the businesses in the downtown; and developing public spaces, buildings, and infrastructure as a catalyst for revitalization and public-sector investment in the Downtown.

The Economic Development Strategy indicates that representatives from the City's Tourism Sector identified the Arena and Convention facility as "the jewel in the crown", that "it unlocks the potential for our community"¹⁰.

The relocation of the "jewel" and the largest visitor draw to the downtown to a suburban location would be in direct contrast to the objectives and recommended actions of the City's Economic Development Strategy. In fact, Objective 7.1 of the Strategy – "Invest in Facilities, Spaces and Initiatives Needed to Support the Growth of Tourism" specifically recommends the development of a multi-purpose facility or facilities in the downtown core, including the consideration of an arena/sports complex.

It is also worthwhile to note that within the Economic Development Strategy there is not a single reference to casinos, gaming or slots as contributing to the economic development of the City or something the City should pursue to enhance economic growth.

Sudbury Downtown Master Plan

The Sudbury Downtown Master Plan was commissioned and approved by the City of Greater Sudbury in 2012 and functions as the blueprint to guide the revitalization of Downtown Sudbury over the next ten years (i.e. to 2022) and beyond, detailing a series of actions and initiatives necessary for this transformation and specifying their timing and allocating responsibilities.

The Downtown Master Plan has been carefully prepared to enable the City to meet its own policy objectives, as well as those required by the Province:

⁹ From the Ground Up 2015 -2025 p. 31.

¹⁰ From the Ground Up 2015 -2025, Appendix A: Consultation Summary p. 63.

The Official Plan recognizes the important role of Downtown as an employment centre within the City. The new Northern Growth Provincial Plan requires that municipalities develop strategies to encourage a significant portion of future residential and employment development locate in strategic core areas and other opportunity areas, such as brownfields. Building on these policy directions, the Master Plan proposes a program of public and private investment in the downtown necessary for it to achieve the self-sustaining critical mass and play its optimal role¹¹.

The study emphasises why it is important for municipalities to protect and promote economic growth in their downtowns:

The study notes that:

a struggling downtown sends a negative message to future residents, businesses and investors.

Conversely, a successful downtown:

- ... creates a positive image for the Region.*
- ... supports a strong tax base for the city.*
- ... acts as an incubator for new business growth.*
- ... retains and creates new and different jobs.*
- ... protects property values in surrounding neighbourhoods.*
- ... is a significant tourism destination.*
- ... allows growth to occur in an efficient and sustainable way.*
- ... is the meeting place for the city¹².*

The Downtown Master Plan calls on Downtown Sudbury to be a “Destination”:

The Vision for Downtown Sudbury is for it to be the urban playground for Northern Ontario. Sudbury should be the leading destination for business meetings, sports events and cultural and community festivals in the North. However, at present the city lacks many of the facilities necessary to assert this leadership role and many other cities are eager for this business. If Greater Sudbury is to remain competitive and firmly establish itself as the Centre of the North, it cannot remain static. The City must continue to invest

¹¹ Downtown Sudbury a plan for the future going downtown growing downtown, March 2012. p. 40.

¹² Ibid. p. 3.

strategically in its downtown and foster growth that will deliver wider benefit to the city as a whole¹³.

The Downtown Master Plan advises that a number of large-scale initiatives are required, which in turn create the market for retail, restaurant, recreation and other related activities. Importantly, they will set the required environment for residential investment, a critical strategy for downtown success.

One of these projects calls for upgrading the Arena in combination with the construction of a new multi-use facility south of Brady Street with a four-star hotel overlooking Memorial Park.

The Master Plan provides its vision of this initiative:

The Shaughnessy District has brought new energy to the southern portion of Downtown with the rejuvenated arena complex, four-star hotel and new multi-use community and conference space. With events held weekly, the centre is booked solid by a mix of business groups, not-for-profits and community groups. Festivals, food, music, film and the arts keep downtown buzzing¹⁴.

The Downtown Master Plan is the policy document which lays out the City's investments in the downtown over the next 10 years. It is also a document that Sudbury residents and businesses rely on to make their own investments. The Downtown Master Plan, after careful study and long-term consideration has identified the need to undertake significant investment in its Downtown. The Sudbury Community Arena, including a new hotel is an important part of the City's investment strategy.

The proposed Kingsway Entertainment Centre would be diametrically opposed to this strategy. Rather than encouraging investment in the downtown, it would involve the removal of existing infrastructure out of the core and would, in effect, actively encourage businesses to relocate from the core to a suburban location. The vision promoted for the Kingsway Entertainment District includes a wide range of commercial and entertainment businesses, including retail shops, restaurants and a convention centre which would serve to drain business from the core, as well as, other parts of the City. In our opinion, this would not only be economically harmful to the core, it would be contrary to the City's own policies and the policies of the Northern Ontario Growth Plan.

¹³ Ibid. p. 40.

¹⁴ Ibid. p. 29.

4.0 The PwC Reports Confirmed Downtown as the Preferred Site for a New Arena

PwC prepared two reports addressing potential options for the redevelopment/relocation of the Sudbury Community Arena. The first report dated February 21, 2017, provided an overview of arena operations elsewhere in Canadian Hockey League (CHL) cities and made recommendations with regards to a supportable size and the various design components for a new arena in Sudbury. It provided preliminary cost estimates and financial projections based on assumptions surrounding facility utilization and programming. It prepared a high-level non-location specific economic benefits analysis of a new arena and finally, provided a set of criteria to guide an analysis of a preferred location.

In our view, one of the most important discussions relating to location is found on pages 73 and 74 of this report, where the authors discuss the importance of location in terms of generating economic impacts for a community. They refer to a number of downtown arena projects, including London, Kingston, Oshawa, Guelph and Moncton, that have had substantial positive impacts in terms of attracting new investment into a community.

They also cite some non-downtown arena projects, such as Barrie, though in this case, they suggested that the surrounding development activity was likely due to traditional market forces attracted around Highway 400 rather than to the arena. Based on our significant experience in the Barrie market, we would agree that this is the case. They also refer to Medicine Hat, Alberta, where the Canalta Centre was constructed on land donated by a developer. They note that this area was already developing as a retail node, but that the Canalta Centre helped to spur and advance development of the area. Finally, they note the Mohegan Sun Arena in Wilkes-Barre Pennsylvania where the area around the arena had been transformed from “worthless property” into one of the busiest retail districts in the region. Again, they note that the success with the facility was due, in part, to its location in a rapidly growing regional economy, with a population of 14 million people within a 100-mile radius. In all cases, where they refer to suburban-based arenas, the areas around the arena sites had already been subject to strong market growth regardless of the presence of an arena.

They conclude that to maximise spin-off development around arenas, strong local economic conditions and supportive planning will be required.

The final sentence, which concludes the report, provides insight into a preferred location strategy:

In greenfield sites, this amount of critical mass will sometimes need to be “created” and could take years to fully evolve, whereas in more urban locations, a critical mass of space is likely already present and city cores are able to realize positive spin-off benefits more quickly¹⁵.

The second PwC report dated June 2017 applies a set of criteria developed in the first report to evaluate the potential of 23 sites to accommodate the new arena. Based on physical constraints, such as site size and dimensions, proximity to parking, proximity to arterial roads, proximity to municipal services, and suitable soils/geology, the 23 sites were reduced to four shortlisted sites, which were evaluated using eight criteria developed in the first report.

These include:

- **Vision** – Whether the Events Centre concept on the site is consistent with the overall long-term strategic vision of the City.
- **Complimentary Benefits** – The ability of the Events Centre to enhance the surrounding area.
- **Ease of Development** – Cost and timing on a particular site.
- **Access** – Whether the site is or can be easily accessed by vehicle, pedestrians or transit.
- **Parking** – Whether sufficient parking would be available to support the Events Centre.
- **Cost** – Total cost of development, including land acquisition, site preparation.
- **Economic Impact** – Whether a particular site has an enhanced economic impact for the surrounding neighbourhood, the City or the Region.
- **City Building** – Whether the development of a site would enhance economic growth, quality of life, citizen satisfaction and community pride.

¹⁵ Proposed Sports and Entertainment Centre Feasibility and Business Case Assessment, City of Greater Sudbury, PwC, February 21, 2017. p. 75.

PwC applied these criteria to four distinct sites:

- A 19.2-acre property on **Maclsaac Drive**, near the intersection of Regent Street and Long Lake Road
- A 22-acre site on the south side of Regent Street at **Algonquin Road**
- A 23.1-acre site on **The Kingsway** in the Jack Nicholas Business and Innovation Park, which would be developed as part of a broader entertainment district with a casino and other complementary uses.
- A 3.0-acre site in **Downtown Sudbury** adjacent to the existing arena.

After applying all of the criteria, PwC ranked the Downtown site as the most desirable, followed by the Kingsway Site, the Maclsaac site and the Algonquin site. The Downtown site had the highest ranking in all categories except cost impact where it finished second to the Kingsway site and parking where it finished fourth.

5.0 Analyzing Only the Council-Deemed “Highest Importance” Criteria is a Flawed Approach

While using all of the criteria, the PwC Reports deemed the downtown as the preferable site for a new arena. However, Council directed PwC to separate the criteria into three groups:

Of Highest Importance

- Cost
- Economic Impact
- Parking

Extremely Important

- Complementary Benefits
- Access
- Ease of Development

Important

- Vision
- City Building

Using only those criteria which Council deemed of Highest Importance (Parking, Cost, Economic Impact), the Downtown site finished second behind the Kingsway site. The MacIsaac and Algonquin rankings remained unchanged at 3rd and 4th respectively. In our opinion, this is not a valid approach to analyzing the merits of a location, because it ignores factors that should be considered. In fact, in its analysis, PwC had already devised a weighting system for each criterion, so that some factors were given higher weightings than others, but all factors were considered. Only considering the factors deemed of Highest Importance to Council ignores other important factors which should be considered in terms of any decision – such as vision, city building, complementary benefits to the community, accessibility, and ease of development. Without considering these factors, a decision cannot be made based on a full understanding of the implications of the project.

Equally important, however, is that there are a number of significant issues with the PwC ranking system that likely unfairly and incorrectly skewed two of the criteria deemed of Highest Importance to Council against the downtown site – Cost and Parking.

Cost Criteria

Firstly, the cost information available to the consultants was only at a very high level, particularly costs related to infrastructure and site preparation. As there has been no detailed cost analysis of the sites, PwC could only use very rough estimates. For example, with regards to the Kingsway site, site preparation was estimated at between \$10 and \$15 million, while servicing was estimated at between \$5 and \$10 million. Including the \$80 million construction cost for the arena/events centre, the total cost at the Kingsway site was assigned a value of \$98 million.

For the Downtown site, site preparation costs were estimated at between \$5 and \$10 million, while the cost for additional works and servicing has been estimated at less than \$5 million. There were also unspecified costs related to acquiring portions of the site not owned by the City. In addition, the BIA agreed to commit some \$2.2 million if the arena was located downtown. Including the \$80 million to physically construct the building, the Downtown site was assigned a total cost of \$99 million.

In our opinion, given the breadth of the cost range for servicing and site preparation, there is not sufficient precision to rank the two sites differently, particularly when the total cost difference assigned was only about 1% of the total projected costs. Secondly, PwC has suggested that due to the nature of construction costs, that these estimates may be prone to some double counting¹⁶, which further erodes confidence in the preciseness of the estimates.

¹⁶ Greater Sudbury Event Centre Site Evaluation, PwC, June 2017. pp. 15, 18, 21 and 27.

Finally, the servicing costs and site preparation costs at the Kingsway site are far less certain than those of the Downtown site, which already has access to municipal services and has infrastructure in place to support the existing arena. Furthermore, the geotechnical details of the Downtown site are also likely similar to those of sites elsewhere in the downtown, including the recently constructed School of Architecture building. The same cannot be said for the Kingsway site, which would require water and sewer construction and the provision of hydro and as stated in the PwC report: “is vacant and unimproved and contains undulating bedrock with dips and valleys” and would require “a significant amount of blasting and site grading”. In other words, there is considerably more risk with regards to the preliminary cost estimates associated with the Kingsway site.

In our opinion, there is not sufficient information to rank the Kingsway site ahead of the Downtown site (or potentially the other sites) on the basis of cost. A more reasonable approach would have been to rank the Downtown site equal to the Kingsway site in this category, although it is conceivable that the Kingsway site could be more expensive to develop than any of the other three sites, once detailed engineering and geotechnical analysis has been completed.

Parking Criteria

Several issues also exist with respect to the application of the parking criteria applied in the PwC report.

First, while the report ranks the sites on their availability of parking, nowhere is there an analysis of how much parking would actually be needed and whether the downtown site due to its access to transit would require less parking than the other sites. The fact that one site has more parking than another may not be relevant if the excess parking is not needed.

Secondly, the February PwC report notes that:

One of the key elements that must be included in any location decision is access to parking. Remote or suburban locations tend to have adequate land for parking but also tend to have only one major road leading to the site. As a result, while parking may be easily accommodated, there can be significant issues in terms of loading and especially exiting the parking area after an event (a common issue raised in regard to the WFCU Centre in Windsor)¹⁷.

This is exactly the situation in which the Kingsway site finds itself. In other words, all of the traffic leaving the site would be channelled onto the Kingsway. Given that the site is in the

¹⁷ Proposed Sports and Entertainment Centre Feasibility and Business Case Assessment, City of Greater Sudbury, PwC, February 21, 2017. p. 46.

east end of the built-up area, the vast majority of traffic would be funnelled into the westbound lanes when leaving the site. This was not addressed in the parking analysis contained in the June PwC report, which only comments that the Kingsway site could accommodate over 2,000 parking spaces.

Thirdly, the discussion with regards to the parking assessment in the June PwC report is somewhat contradictory. PwC notes that there are more than 3,500 parking spaces within a 10-minute walk of the Downtown Arena site, which in aggregate is more than is available at the three other sites. The study also notes that a “sufficient number of spaces may be available within 600 metres of the site”, which they note is a seven-and-a-half-minute walk. However, this seems to be discounted due to “public perception” that many of these spaces are located too far from the event centre. A similar analysis was not conducted with regards to the Kingsway site – i.e. how far a walk would it take to accommodate a sufficient number of spaces and would this make a material difference in terms of the functionality and market attractiveness of the facility, as opposed to a purely “perceptual” difference.

Fourthly, in the PwC February report, the discussion of the Parking criterion includes the questions: “If additional parking is required, would it be well-used on a daily basis for other purposes?”; and “Would the creation of additional parking be a prudent investment?”¹⁸ These questions were not addressed in the analysis of the four sites conducted in the June report. In this regard, the downtown site would be superior to the Kingsway site in that it would make use of existing parking spaces that are underutilized in the evenings and weekends and would not require the construction of additional spaces that would largely be vacant during non-event times. This speaks to not only financial sustainability but also long-term economic sustainability as required by the Province’s Northern Ontario Growth Plan, as well as the City of Greater Sudbury’s own goal of becoming a sustainable community as documented in the City’s Official Plan.

Furthermore, the PwC June report also indicated that it did not consider a proposed parking facility that could be developed if demand for a Downtown arena and events centre warranted it. While this potential downtown parking structure was not considered by PwC, its first place ranking of the Kingsway site was predicated entirely on the construction of new parking around that facility.

Finally, PwC did not consider the role of parking in terms of enhancing economic development. As noted previously, the City of Kingston, when it developed the K-Rock Centre in its downtown, made the strategic decision to minimize on-site parking so as to promote pedestrian traffic flow through the downtown, thereby encouraging customers to frequent

¹⁸ Ibid. p. 48.

local shops and restaurants. This is a strategy that has been successful in that community. Comparing an expansive acreage of parking on a greenfield site to a parking solution that might be employed in the downtown core to enhance local business development, is not a fair or reasonable approach.

In our opinion, PwC did not have sufficient information available to them in order to prepare a reasonable ranking based on its parking criterion. In its February study, PwC specifically noted that “a detailed and professionally prepared traffic and parking study for each proposed site including an estimation of parking requirements will be needed (does sufficient parking exist in the area surrounding the site and what, if any, street and vehicular access improvements are required)”¹⁹ There is no references in the June report to these studies having been conducted. PwC appears to have reached its conclusions based on developer plans, parking space counts, and “public perception”. Its analysis contains no reference to actual parking requirements, parking utilisation, accessibility, traffic ingress/egress to each site, or other information that would be derived from a “detailed and professionally prepared traffic and parking study”.

In our opinion, the lack of information available to PwC and the assumptions they used to evaluate the parking and cost criteria, unfairly biased their ranking against the Downtown site. The cost analysis undertaken by PwC was conducted at far too high a level and undertaken without supporting infrastructure or geotechnical studies. It could not reasonably have been so precise as to allow for a ranking of one site ahead of another on the basis of a 1% very generalized cost differential. Similarly, the parking analysis appears to have been undertaken without reference to information in studies that even PwC had earlier indicated should be conducted. It excluded numerous data that could have easily yielded alternative results.

Had the PwC analysis appropriately ranked the downtown site equal to the Kingsway site in terms of cost and had taken all of the above noted factors into account for the parking analysis, the downtown site would have been ranked highest not only overall, but also in terms of those criteria identified as of highest importance to Council.

6.0 The Relocation of the Arena Would Harm Businesses Within the Downtown Core

A key piece of information that has been lacking from the arena location analysis is the impact on the Downtown should the arena be moved outside of the core. The arena is the largest visitor draw to the downtown and supports numerous businesses in the downtown core

¹⁹ PwC June Report p. 47.

notably restaurants and pubs, as well as other retail and commercial establishments. In addition, as a prominent attraction, it provides additional exposure to the downtown core through marketing and advertising and adds prestige to the core.

The loss of this major facility will affect both specific businesses which rely on customers to the arena, as well as, the downtown core in general. Furthermore, we note that the construction of a new arena is also expected to involve the expansion of a range of major entertainment facilities. This includes potential new entertainment uses that are not currently located in Sudbury and—if relocated to, or expanded on the Kingsway site—could adversely affect the remaining food and entertainment uses located in the downtown. If these types of uses are ultimately concentrated at the Kingsway site, it would also be difficult for existing businesses in the downtown to ever recapture this level of attraction or draw.

In the case of Windsor, in 2008 the former downtown arena that was home to the Windsor Spitfire was closed and a new arena (WFCU Centre) was opened in a suburban location about 12 kilometres outside of the core. While there are many factors at play, Downtown Windsor has been in steady decline since 2000 and the loss of the traffic to the arena helped to hasten the issues facing the core. Since its closure, the former arena has been used for minor league and university hockey games, sat vacant and been used for salt storage for the municipal works department. There is currently a proposal to develop a school on the site for the Catholic School Board. Unlike downtown Sudbury, downtown Windsor has a relatively large resident population to support the eventually reuse of the site. If this redevelopment occurs, it would represent a 10-year span since the arena was vacated by its major tenant.

In our opinion, any decision to relocate the arena to a suburban location should not be made without examining the impact of this relocation on the downtown.

7.0 An Entertainment District including a New Casino Will Redirect Business Away from Other Parts of the Community

As noted above, the loss of a major attraction, such as the arena, will undoubtedly negatively impact Downtown Sudbury. A large-scale entertainment district with a casino will also draw commercial traffic away from other parts of the City. For example, as is typically the case in other communities, restaurants and other food services that are located in the casino often are able to outcompete similar businesses in other parts of the City on price and special offerings. The vision being promoted for the entertainment district also calls for shops and boutiques to be integrated in the concept. This could potentially impact established retail nodes that have already been designated in the Official Plan as important to serving the entire

city and beyond²⁰. A question that needs to be addressed as part of any examination of the arena relocation and establishment of a new entertainment district, is whether business losses in the downtown and other parts of the City will be offset by broader positive community benefits. This has not been addressed in the PwC analysis.

As per the current proposal, the arena would be relocated and situated on the Kingsway site as part of a concept for a “Kingsway Entertainment District” which is also planned to include a new casino (which would be relocated from Sudbury Downs), a hotel, restaurants, retail outlets, and other possible entertainment/recreation/convention uses.

Another key question that needs to be addressed, is whether there would be sufficient market growth or recapture to support an entertainment district. In our opinion, it is more likely that in the absence of another major draw in the downtown to replace these food and entertainment and retail functions, such a relocation would simply cannibalize expenditures that are already being made elsewhere in the City. The retail impact of the proposed Kingsway development on the existing commercial nodes should also be studied. Finally, with limited options available, it is unlikely that a new or different major draw could be introduced to the downtown in the coming years.

8.0 The Kingsway Proposal Would Jeopardize the City’s Planned Transformational Large Projects

In November 2012, the City invited its citizens to propose large scale projects that would be transformational to the City. At its meeting, on September 12, 2017, the City gave direction to staff to implement two of these projects – the Greater Sudbury Convention and Performance Centre and the Library/Art Gallery.

In evaluating the location for these important projects, the City determined that the re-use of the existing Arena was the most appropriate way to accommodate both projects. A City staff report dated November 15, 2017 analyzed a number of sites and ranked the existing Arena site as the best option.²¹

It is also important to recognize that this report was completed with the assumption that the Kingsway Entertainment District would be approved and constructed, as one of the reasons

²⁰ In addition to the Downtown, the Official Plan designates three Regional Centres, which are commercial centres serving a catchment area extending beyond the City. These commercial centres are permitted to expand to include other uses, as a means of utilizing existing infrastructure and achieving increased urban intensification.

²¹ City Council Report – Greater Sudbury Convention and Performance Centre /Library Art Gallery Update.

given for selecting the arena site was “It addresses community concerns about the future of this site after the Kingsway Event Centre opens”²².

In our opinion, the proposed Kingsway Entertainment District would, to no small extent, duplicate the function of a convention centre and a performance centre. At best, the proposed Kingsway Entertainment District would impede the market for these uses downtown, by offering discounted competitive facilities as an attractor to potential gaming patrons. Similarly, the transfer of hospitality infrastructure from the downtown to the Kingsway site would further reduce the viability of the performing arts centre and convention centre in the downtown.

At worst, the Kingsway Entertainment District would make a performing arts venue and convention centre in downtown redundant – thereby offering no comparable replacement for the Arena and substantially increasing the tourist and entertainment draw away from the core.

The City’s report discusses the vision for a hotel associated with the convention centre, but provides no analysis as to whether there is sufficient market for a new hotel, in addition to the hotel facilities being planned as part of the entertainment district, nor does it provide any analysis of how the convention centre would effectively compete with the Kingsway casino/arena/hotel development that would likely contain conference and meeting facilities in addition to having direct access to the arena space. Potential impacts on the existing hotels in the Downtown should also be studied, as they could be significant.

On the other hand, a convention centre and arena developed together in the downtown core in conjunction with a performing arts centre together with the library/art gallery, would transform the downtown into a vibrant entertainment/tourism hub that would support restaurants, hotels, and other local businesses. In particular, a downtown convention centre adjacent to the new arena would enable the City to compete for a wide range of conventions, consumer shows, business meetings, special events and other activities that would draw visitors and their expenditures into Sudbury and support a vibrant downtown core.

We would also note that the Kingsway development has already recognized the connection between the arena and convention centre and has produced a promotional video showing a convention centre as part of the Kingsway Entertainment Centre complex.

To date, no economic analysis has been undertaken to determine either the impact on downtown of relocating the arena to the proposed Kingsway entertainment district or the

²² Greater Sudbury Convention and Performance Centre/Library Art Gallery Update, November 15, 2017. 5th unnumbered page under “Analysis” section.

economic benefits that would be derived from the creation of a downtown hub including the Arena, a convention centre, a performing arts venue, a library and art gallery.

9.0 A Casino Would Not Have a Significant Impact on Tourism and Would Draw Heavily from within the City of Greater Sudbury

Over time, as gaming has become more ubiquitous across North America, its uniqueness as a tourism draw has waned. The introduction of online gambling by numerous operators, including the Ontario Lottery and Gaming Corporation has further eroded the draw of physical casinos. In addition, casinos are not part of the entertainment regimen for the smart-phone savvy computer-gaming younger demographic²³.

Although we do not have direct data with regards to the geographic distribution of visitors to the OLG Slots in Sudbury, we have been able to obtain a reasonable approximation through analysing licence plates at the facility and data from cell phone usage. In February 2018, a licence plate survey of vehicles visiting the current Sudbury Downs casino site was undertaken under the direction of urbanMetrics. A description of the methodology and summary of the results has been provided in Appendix B. We would note that in our experience, licence plate surveys tend to over estimate persons travelling to a site from further away²⁴. Regardless, 74% of all vehicle plates recorded were from the City of Sudbury and 88% were from within a distance of 120 kilometres from the site (including North Bay). Based on the typical overcount of non-local customers, we would estimate that between 80% and 85% of visitors originated from the City and some 90% to 95% originated from within 120 kilometres.

This estimate was corroborated through the analysis of cell phone usage data at OLG Slots in July, August and September 2017 and in February 2018. (See Appendix C) These dates were chosen to mimic the high summer tourism season and the same period covered by the licence plate survey. Visitation patterns by month were very similar, and on average some 90% of visitors arrived from within 120 kilometres of the site plus North Bay and 84% originated from within the City of Greater Sudbury. Only 9% originated from outside of Northern Ontario.

²³ Canadian Gaming Business. "Demographic Dilemma – The Challenge of Connecting with Today's Player", Spring 2017.

²⁴ For example, licence plate surveys would not capture persons arriving by means other than their private vehicle (e.g. taxis or persons being dropped off), they would not be capable of distinguishing a person who had moved to the local area, but had not changed their address on their drivers licence, they cannot distinguish the ownership of leased vehicles (i.e. someone driving a vehicle leased by their company) etc. These factors tend to inflate non-local visitation between 5% and 15%.

This is consistent with other evidence which indicates that Northern Ontario casinos do not draw heavily outside of their own communities. A 2006 survey by the Ontario Problem Gambling Research Centre determined that the two Northern Ontario Casinos in Thunder Bay and Sault Ste. Marie attracted some 90% and 86.5% of visitors from within their own communities. Only about 5% of visitors to the Sault Ste. Marie casino were from outside of Ontario and only 2% of Thunder Bay casino patrons were from outside of the Province. As a smaller slots-only facility not close to an international border and with extensive and growing gaming competition serving the GTA, we would not expect Sudbury to differ from the experience of these other Northern gaming facilities.

Based on 2014 Statistics Canada Tourism data commissioned by the City of Greater Sudbury²⁵, the Sudbury Tourism market is oriented towards persons visiting from North Eastern Ontario, and persons travelling to Sudbury to visit friends and relatives and for personal appointments. The pleasure market represents only about 21% of trips to Sudbury. Persons engaging in casino gaming (i.e. OLG Slots) represent a miniscule proportion of the market. The following summarizes the current Sudbury tourism market:

- 60% of current tourists are from Northern Ontario and 93% are from within the Province.
- 70% of visitors to Sudbury come either to visit friends and relatives or are visiting for a specific personal reason (e.g. to shop, doctors/dentist appointment, etc.).
- The pleasure travel market represents only 23% of visitors to Sudbury.
- Only 1% of visitors reported visiting a casino as part of their trip. The most common activities by Sudbury Visitors were visiting friends and relatives; outdoor sporting activities; shopping and medical/dental appointments.
- 54% of visitors did not stay over night.
- 52% of nights stayed were at a private home. Only about 25% were at a hotel, motel, commercial cabin, or other commercial property.

In our opinion, the current tourism market is not well predisposed to gaming activities. There is not a large pleasure market seeking alternative entertainment options. The pleasure market currently makes up less than about one-quarter of a relatively small tourism base with a strong orientation towards outdoor activities vs. night life/dining/urban entertainment. There may be potential to attract persons visiting friends and relatives, however, at least part of this would comprise transfers of expenditures from other parts of the City, and it likely

²⁵ 2014 Sudbury Tourism Profile based on Statistics Canada microdata which contain anonymised data collected in the Travel Survey of Residents of Canada and the International Travel Survey.

would not result in increased lengths of stay or additional nights in commercial accommodations.

Attracting tourists to a casino in Sudbury would likely require tapping into new markets not currently visiting Sudbury. The difficulty with this is that Ontario is significantly increasing its gaming infrastructure across the Province, and particularly in the GTA, which represents the foremost tourist market for Ontario attractions. In other words, a casino in an event centre in Sudbury would have to compete with expanding casinos that are much larger and much closer to the audience it is trying to attract. The US market in Sudbury is very small and is already served by larger casinos at the major border crossings.

In our opinion, while the proposed entertainment centre would be able to expand the visitors and revenues generated by a casino, the vast majority of growth will be derived from Sudbury residents.

10.0 Growth in Gaming Revenues from an Expanded Casino Will Be Derived Mainly from Sudbury Residents.

Gaming in Sudbury until recently operated as OLG Slots Sudbury²⁶, and was a slots-only facility. The Ontario Lottery and Gaming Modernization program, however, has changed the gaming landscape across the Province. Following a competitive bidding process, OLG has entered into agreements with private gaming companies to operate geographically defined gaming bundles, which involve among other aspects the creation of new gaming sites, the expansion of existing sites, and the establishment of table games at locations that had previously operated as slots-only facilities. As part of its Modernization plan, OLG entered into 20-year agreements with Gateway Casinos and Entertainment – a British Columbia-based gaming company owned by a Toronto private equity investment firm²⁷ to operate the Northern and Southwest Ontario Gaming Bundles.

The Northern Ontario Bundle includes the existing casinos in Sault Ste. Marie and Thunder Bay, OLG Slots Sudbury currently operating at Sudbury Downs, and a new casino location in North Bay. Following the acquisition of the Northern Bundle, OLG Slots Sudbury has been rebranded as Gateway Casinos Sudbury and can now include table games. As OLG Slots Sudbury, the facility offered 407 slot machines and was staffed by 141 full and part-time employees.

²⁶ Prior to that it was known as The Slots at Sudbury Downs, when it co-existed with the horse race track.

²⁷ The Catalyst Capital Group

The current proposal by Gateway would be to relocate the casino from the Sudbury Downs site to the Gateway site as part of their concept for an entertainment district that would also include the relocated arena and other hospitality and entertainment facilities, including restaurants and likely retail outlets. Gateway has announced that it would invest \$60 million in the new casino property. The company has not specified, the extent to which it would expand its gaming offering, however, its agreement with OLG allows for the operation of up to 600 slot machines and 180 table positions (the equivalent of 30 table games).

The relocation to the Gateway site would require approval of both OLG and the City. The Ontario Lottery and Gaming Corporation Act regulations require that public input is required before the municipality can approve a new gaming site. It is our understanding that the required public input into the Gateway site has not yet been provided and OLG has not yet approved the Kingsway site for a casino. Furthermore, the proposed Kingsway Entertainment District would be contrary to the policies of the City's Official Plan, the Northern Ontario Growth Plan, as well as, the policy direction and actions prescribed to the City by the Downtown Master Plan and its *From the Ground Up* Economic Development Strategy.

In order to properly inform the public about the merits of an expanded and relocated casino, an economic impact study should be conducted to more fully understand the economic and financial implications to the City. To our knowledge, this has not yet been undertaken by the City. To better understand the implications of an expanded casino, we have been able to analyze some operational data available from OLG.

During the fiscal 2016-17 year the Slots at Sudbury Downs attracted 400,000 visits²⁸.

Based on the City's 5.25% share of Slots revenue reported as \$2.2 million in 2016/17, the total facility "win" would be approximately \$42 million. We have undertaken a detailed analysis of the performance of the Sudbury slots facility and compared it to other OLG Slots and Casinos across the Province in order to estimate the casino win if the gaming facility were to be relocated to the Kingsway site. The detailed data supporting our conclusions are found in Appendix A. In our opinion, a casino on the Kingsway site would generate approximately \$75 to \$80 million in slots and table win. The following summarizes the logic behind this estimate.

- The Kingsway site is better positioned with respect to the general Sudbury population than the current Sudbury Downs site and could expect to have a greater draw from within the City.
- Similarly, the casino would have the ability to draw on the additional crowd attracted to the site on game and event days.

²⁸ 2016-17 OLG Community Benefit Summary.

- The four OLG operated (non-resort casinos) draw more relative to the size of their Primary market population than the Slots only facilities. In 2016-17, they attracted 2.07 visits per resident within 40 km compared to only 0.8 visits for slots-only facilities. This, however, is partly due to the fact that the casinos are situated within urbanized areas, whereas the slots facilities tend to be situated on racetrack sites in rural settings. Furthermore, average casino performance is skewed by the Thunder Bay casino, which is one of only two gaming sites that currently have no other gaming competition within a 40-kilometre radius (The other being the OLG Slots Sudbury)²⁹.
- The win per resident within 40 km is also significantly higher for casinos than for slots-only facilities. On average casinos attract about 74% more slot win per capita than slots-only facilities.
- There is a positive correlation between the number of slot machines and the slot win per slot facility visit. The five slots-only facilities with 252 or fewer slots machines averaged \$75 in win per visit, where as the seven facilities with 738 or more slots machines generated an average of \$111 per visit. Sudbury, however, is an anomaly, in that its current 407, and potential for 600, machines fall within a sizable gap relative to the other slots-only facilities (the next largest is London with 738 slots and the next smallest is Centre Wellington with 252 slots). While it is not possible to definitively conclude that an increase of about 200 slot machines in Sudbury would generate higher revenues per visitor, it is likely given the data from slots facilities across the province.

These factors would suggest that the relocation of the facility and its conversion to a casino with up to 600 slots would result in an increased win for the new facility. However, there are some other factors that will serve to dampen the potential increase in win.

- The current Primary market population for the OLG Slots Sudbury (i.e. the population within 40 kilometres) is 162,000, while the Secondary market population (i.e. the population between 40 km and 120 km plus North Bay) amounts to 108,000, as per 2016 Census data. The Primary market population will not change with the relocation to the Kingsway site. The Secondary market population however will be substantially reduced after the opening of a casino in North Bay – declining from 108,000 to just 29,000.

²⁹ The Sault Ste. Marie Casino has no Canadian competition within 40 kilometres, but the much larger Kewadin Casino is situated within a 10-kilometre drive from the OLG casino in Sault Ste. Marie, Michigan and the Bay Mills Casino and Resort also in Michigan is about 40 kilometres from the OLG casino. Similarly, the OLG Slots at Rideau Raceway in Ottawa has no Ontario competition within 40 kilometres, but is within 25 kilometres of the Casino du Lac-Leamy in Gatineau, Quebec.

- Tourism to Sudbury is discussed further below. In our opinion, gaming by tourists outside of the 120-kilometre radius from the Kingsway site is not expected to be a significant factor affecting the win. The GTA market is already well served by major gaming venues, including Woodbine, Innisfil (Georgian Downs), Casino Rama Resort Casino and to a lesser extent Ajax and Great Blue Heron, as well as, Milton, Hamilton and the two Niagara Resort Casinos. The conversion of the current slots-only facilities (Woodbine, Innisfil, Ajax, Milton and Hamilton) to casinos with table games, and the planned expansions of Woodbine and Great Blue Heron, as part of OLG's modernization programme will further strengthen the GTA gaming infrastructure. In addition, major US border crossings are already served by casino gaming sites, both on the Canadian and the US side. It is unlikely that the smaller scale of the casino in Sudbury would be able to attract a significant number of new tourists to the community and would most likely simply draw on existing residents and tourists already attracted to the City for reasons other than gaming.
- Revenue per visit and slot revenue per machine/day are lower at casinos than slots-only facilities. This is likely because table games compete with slots for player revenue and because a portion of casino visitors are attracted predominantly to table games. In addition, as the casinos tend to be in urban locations, unlike the slots-only facilities, it is expected that the casinos generate more frequent visitation with lower spending per visit. The average slot win per machine per day was estimated at \$201 at casinos and \$416 at slots-only facilities. The win per visit was \$70 at casinos and \$103 at slots-only facilities.
- The OLG Slots Sudbury already generate very high revenues and visitation based on its population within 40 km. The 2.46 visitors per population within 40 kilometers is well above the average of 0.8 for slots facilities and 2.07 for casinos. Its win per capita of \$258 is second highest of all slots-only facilities and only lower than Thunder Bay and Sault Ste. Marie among the four casinos. This is due to the fact that the OLG Slots Sudbury currently has no competition within about 250 kilometres and serves the North Bay market which does not yet have a gaming facility³⁰. However, with the opening of a casino in North Bay, its market share from east of the City will be reduced significantly.
- Our revenue estimates are based on the following assumptions:

³⁰ The nearest gaming facilities to Sudbury are Casino Rama to the south and the Sault Ste. Marie casino to the west both approximately 250 kilometres from the City.

- The number of visits to the Sudbury facility on the Kingsway site will double from 400,000 to 800,000 due to a larger facility, cross visitation on hockey game and event nights, and closer access for many Sudbury residents. This represents approximately 5 visits per population within 40 kilometres – an increase over the current level of 2.46. This would be comparable to the draw of the Sault Ste. Marie Casino and well above any current slots-only facilities.
- The slot win per visit will be reduced from a current level of \$110 to between \$65 and \$70. This recognizes that reduced slot revenue per visit will result from the introduction of table games and increased frequency of visitation by the local population (i.e. patrons will visit more often, but spend less per visit).
- We have estimated that casino table win will represent approximately 30% of overall casino win which is consistent with existing resorts and other casinos in Ontario³¹.

These assumptions would result in an increase in casino win from a current level of \$42 million to between \$75 and \$80 million. This represents an increase of between \$31 and \$36 million. Based on our analysis, the vast majority of which will be the result of increased spending by Sudbury residents.

11.0 The Majority of Money Spent at the Casino Will Leave Sudbury?

One of the most important considerations in determining the economic impact of an investment is understanding where expenditures are made and how revenues are ultimately distributed. A labour- intensive tourist attraction near an international border will typically draw more revenues from outside of the community than monies flowing outside of the community in terms of corporate profits, specialized labour and equipment, administrative costs, etc.

This is not necessarily true of a casino in an internal site that generates far more in revenues than it pays in annual wages and may not have access to a large tourism market. In the case of the OLG Slots Sudbury, during the 2016/17 corporate year the facility generated revenues of \$42 million. Assuming that Sudbury was similar to Sault Ste. Marie in terms of visitation from outside of the community, then 85% of these revenues or \$35.7 million would be

³¹ Ernst & Young reported that on average Ontario resort casinos generate between \$1.0 and \$1.1 million per table and \$100,000 per slot, which they indicate is consistent with Las Vegas casinos. (E&Y Commercial Casino in Toronto, October 2012. p. 36). Based on these levels urbanMetrics has calculated that the four resort casinos in Ontario would generate between 29% and 30% of their revenues from table games. This is consistent with our experience.

derived from Sudbury residents and just \$6.3 million would be derived from persons living outside Sudbury. Based on the unadjusted licence plate survey results, which likely over state the volume from outside of the City, 75% of these revenues or \$31.5 million would be derived from within the City with about \$10 million being derived from outside.

As reported by OLG, the monies specifically spent in Sudbury (and surrounding region) include:

- \$8.0 million in wages and benefits for gaming employees;
- \$1.4 million in purchases from local and regional vendors;
- \$2.2 million as the City of Sudbury's share of slots revenue; and,
- Just under \$50,000 in sponsorship of local festivals and events³².

This totals just over \$11.6 million. In addition to this, there would be a small amount paid for rent to the owner of Sudbury Downs that could be deemed to stay within the community. In other words, OLG Slots would draw in only \$6 to \$10 million from outside of Sudbury and distribute \$30 million outside of the community. Effectively, \$20 to 24 million is drawn out of the City's economy each year by the current slots facility.

What this means is that moneys that could otherwise have been spent in other entertainment, retail, restaurant and hospitality venues in the City would have been drawn to the slots, where they would flow outside of the City to the Provincial government.

However, it is important to note that revenues from casinos and slots go into the Province's Consolidated Revenue Fund, which is the general fund through which most of the government's revenues flow. From these revenues, the Province pays for many community benefits, such as hospitals, amateur sports, community services, etc. The Province also supports the Ontario Trillium Fund, which provides funding for charitable and not-for-profit organizations. So, some of these funds may and likely do flow back into the City. However, there is no way of knowing (a) whether more gaming funds are channelled back to the City than are taken from it; (b) whether the Province would spend any less in Sudbury if it didn't have the slots facility; and (c) how much money generated by a casino in Sudbury is being used to fund projects in communities without gaming facilities.

There is little doubt that the current slots facility is drawing more money out of the community than is directly spent in the community through wages, the City's share, etc. How much, if any, of these revenues that are reinvested in Sudbury is now controlled by the Province.

³² OLG Community Benefits Summaries 2016/17.

Going forward, the situation is likely to be less favourable to the City, as significantly more gaming expenditures will be drawn from Sudbury residents and future profits will now be shared between the Province and the private operator – which is a BC Company whose principal shareholder is a Toronto investment firm. Unlike the Province who has a duty to the people of Ontario, Gateway Casinos is a private company obligated to its shareholders and is under no obligation to invest its profits in the local community.

While Gateway Casinos has indicated that it plans to invest \$60 million into a new casino on the Gateway site, this is less than the net casino revenues that are projected to be generated in the first full year of operation. The company has indicated that this construction project would generate 700 years of construction employment. This would be the equivalent of about 16 full time permanent jobs³³. While most of this employment will be derived from within the City, some may need to be sourced from outside depending on the local availability of labour and the specialization of construction skills required.

While a \$60 million investment would be important to Sudbury, it is relatively small in comparison to the net revenues that will be flowing to the Province and the new operator on an annual basis.

In our opinion, an economic impact analysis that fully examines whether the City will benefit from the proposed casino has not been undertaken. This study would be key to the community's understanding of the implications of a casino prior to providing public input into the proposed Gateway site.

12.0 The Kingsway Entertainment District May Not Result in a Significant Net Employment Gain for the City

While the proposed Kingsway Entertainment District will be a relatively large employer within Sudbury, it will not likely generate many actual new jobs within the community. This is true for several reasons:

- The largest proportion of jobs will simply be transferred from the OLG Slots at Sudbury Downs and the Sudbury Community Arena to the new site and will not represent new jobs;
- The growth in casino win, for the most part, will be derived from Sudbury residents, who would otherwise have spent their money elsewhere in the local economy and would otherwise be supporting jobs elsewhere in the community.

³³ Based on a 45 year average working career.

- Casinos and slot facilities are not efficient generators of local employment relative to their revenues, and relative to other hospitality and entertainment businesses, such as hotels and restaurants. For example, \$1,000,000 spent in a restaurant will generate significantly more jobs than \$1,000,000 spent in a casino. Every dollar transferred from restaurants and other hospitality venues in Sudbury to the Casino, represents a net loss in employment. This is largely related to the large profits taken by casinos and their lower staffing cost to revenue ratio.

Transfer of Jobs from Existing Facilities

The proposed Entertainment District would encompass the Sudbury Community Arena, a casino, a hotel, restaurants, and potentially other unspecified retail, hospitality and entertainment uses. The arena would have a slightly larger capacity than the existing downtown arena, so it may employ a small number of additional employees. However, the bulk of employees would simply be transferred from the existing arena. Most importantly, an arena on the Kingsway site would likely not employ any additional employees than if it were redeveloped in the downtown core. So, with respect to the arena, the Kingsway site would not result in any additional jobs to the community.

Gateway Casinos has announced that it would employ up to 400 employees³⁴. However, there are currently some 141 formerly OLG employees at the Sudbury Downs site and another 50 workers employed by the race track owner in maintenance, janitorial, security and other positions. So that the net additional employment would be approximately 210 persons. As the casino would include a significant increase in bar and restaurant facilities over the former slots facility, we estimate that about two-thirds of these new jobs would be related to the food service and gift shop facilities³⁵.

A hotel could also be included as part of the concept. We would note, however, that the concept for the downtown entertainment centre/arena also included a hotel, so that if the local market demand was available to support a new hotel, the Kingsway Entertainment District would simply be transferring this employment opportunity from the downtown.

Transfer of Employment from Other Local Sectors

As the bulk of new casino expenditures (gaming and non-gaming) will be derived from Sudbury residents, the vast majority of employment at the casino would be created from

³⁴ News release by Gateway Casinos June 13, 2017 and Statement by Gateway Casinos January 3, 2018.

³⁵ OLG Non-resort casinos currently generate approximately 15% of their income from non-gaming. Assuming that the casino generates \$80 million in revenues this would result in approximately \$14 million in non-gaming revenues. In full-service restaurants, salaries comprise 30% to 35% of sales. At 30%, this would amount to \$4.2 million in wages and salaries. At an average (full and part-time) salary of \$25,000 this would result in 168 employees. At \$30,000 average salary this would result in 140 employees.

revenues that would have otherwise have been spend elsewhere in Sudbury. For example, if a couple decided to go to have dinner and gamble at the casino, whereas prior to the casino's opening, they would have gone to a local restaurant and a movie, their expenditures would simply be lost to the local restaurant and movie theatre. As this occurs on a broader scale, other local commercial operations will reduce their employment, dampening or eliminating the employment benefits of the casino.

Casinos are Not Efficient Local Employment Generators

Based on the revenues they take in, casinos are not efficient employment generators compared to other hospitality and entertainment businesses. This is because a very large share of revenues are paid out in profits to the operators and not paid to employees in wages. For example, in 2017 the former OLG slots Sudbury employed some 141 OLG employees, with some 50 other employees and generated gaming revenue of \$42 million and a marginal amount of non-gaming revenue. This amounts to only some 4.5 employees per \$1,000,000 in revenues. Based on the Gateway Casino estimate of 400 employees and assuming \$80 million in gaming revenues and 15% non-gaming revenues, the proposed new casino would generate only 4.2 jobs per million dollars revenue. In comparison, by industry standards restaurant and fast food facilities would employ some 10 to 12 employees per million in revenues.

So, any sales transfers from other parts of Sudbury from more efficient employment generators, such as restaurants, to the casino complex, would represent a net loss in employees for the community.

13.0 The Additional Revenues to Sudbury from The Kingsway Entertainment District Will Not Be Significant

The two principal sources of ongoing revenue the City would receive from the development of the Kingsway Entertainment District would be the share of gaming revenues Sudbury would receive from the casino and property taxes.

Share of Casino Revenues to the Municipality

Under the Municipal Contribution Agreement that OLG signs with host municipalities, Sudbury receives 5.25% of total slot win up to the first \$65 million, 3% on the next \$135 million and lower percentages thereafter. In addition, the City would receive 4% of the table win. As of 2016/17, the City received \$2.2 million in revenues from the OLG Slots facility. With a full-scale casino and expanded slots facilities proposed on the Kingsway site, the revenues available to the City would increase.

As indicated on Figure 1, a new casino generating a win of between \$75 and \$80 million would increase municipal revenues by between about \$1.5 and \$1.7 million annually.

Figure 1: Additional Share of Gaming Revenues from Kingsway Site Casino

	\$75 Million			\$80 Million		
	Revenue	Municipal Share		Revenue	Municipal Share	
		%	\$		%	\$
Slots	\$ 52,000,000	5.25%	\$ 2,730,000	\$ 56,000,000	5.25%	\$ 2,940,000
Tables	\$ 23,000,000	4.00%	\$ 920,000	\$ 24,000,000	4.00%	\$ 960,000
TOTAL	\$ 75,000,000		\$ 3,650,000	\$ 80,000,000		\$ 3,900,000
Less: Existing Revenues			\$ 2,200,000			\$ 2,200,000
Net Additional Revenues			\$ 1,450,000			\$ 1,700,000

Property Tax Revenues

Property taxes would be available from the casino, the hotel and other hospitality facilities that would be developed on the site. Sudbury Community Arena is currently classified for Property Tax purposes as Code 721 – Non-Commercial Sports Complex. As such it is almost entirely tax exempt with the exception of a small amount classified as commercial and payment in lieu. The municipal share of property taxes (excluding the Education share) is approximately \$8,000. If the arena remains at its current status for property tax purposes, the annual tax revenues would not change significantly if it were to relocate to the Kingsway site. The principal source of property tax revenue would come from the casino and ancillary hospitality facilities (i.e. hotel and restaurants).

In order to appreciate the impact of a new facility, such as the proposed entertainment complex, on tax revenues to the City, it is necessary to understand how the property tax system in Ontario works. A new development project does not simply add new taxes to the City, but rather causes a redistribution of funds the City deems it must collect from taxes. Ultimately, the tax rates are set each year based on the total assessment base in the City and the amount of money it determines, through its budget process, must be collected in taxes. A new development project does not provide the City with new money, but rather can reduce the tax burden on the rest of the community.

In the case of the proposed Kingsway Entertainment District, the assessment of the tax benefits to the City must also take into consideration the tax losses from other parts of the City, as well as, the costs that the City will have to bear as a result of any new development.

For example, the City will lose the tax revenue or payment in lieu currently generated by the casino at Sudbury Downs. As an OLG Slots facility at Sudbury Downs, the facility was assessed differently than it would as a full-scale casino, which could be developed on the existing site. The assessed value of the OLG Slots facility as of the 2018 assessment year³⁶ was \$2,309,000. Based on the commercial tax rate in Sudbury, this would generate just under \$80,000 in property taxes, of which two-thirds would be available to the City and the remainder would be for education. We would note that the current assessed value is extremely low in comparison to other gaming facilities in the Province. For example, the Casino in Sault Ste. Marie, which generates a lower win than the OLG Slots Sudbury, is assessed at over \$12,000,000. Similarly, the casino in Thunder Bay, which generates net revenues about 60% more than those of the Sudbury casino slots facility is assessed at \$47 million – over 23 times the value of the Sudbury facility. The conversion of the OLG Slots facility to a privately operated full casino will likely result in a change in assessment methodology and ultimately assessed value; regardless of whether the casino remains on the Sudbury Downs site, is relocated to the Gateway site or elsewhere. An assessment of property tax revenues to Sudbury must take this into account.

In addition, in our opinion, the relocation of the arena will cause some closure or displacement of businesses from the downtown, particularly restaurants, bars and eating establishments that are supported by attendees of hockey games. The casino and associated hospitality components will also draw business away from other parts of the City. To the extent that this causes business losses and/or vacancies in other commercial businesses and hotels, this will also result in reduced property assessments and taxes. Again, these must be deducted from potential Entertainment District taxes to fully understand the true tax impact.

Finally, property taxes are not “free money” to a municipality but come with the obligation of providing municipal services to the building owners, tenants, and employees. A development such as the Kingsway Entertainment Centre will require ongoing municipal services that will consume taxes, such as road maintenance, police, fire and paramedics services, social services, waste disposal services, planning services, general administrative services and other services. A detailed fiscal impact analysis would be required to determine whether the property taxes generated by the Kingsway site would be sufficient to offset the municipal costs required to support the facility.

In summary, while the proposed Kingsway development may generate additional property taxes and gaming revenue to the City, without a detailed fiscal analysis, it is not possible to determine whether these would actually provide a net surplus to the City or represent a loss.

³⁶ Even though the facility had been transferred over to Gateway Casinos in May, 2017, it was still being assessed as a racetrack with slot facility based on MPAC PropertyLine reports.

Clearly, simply examining the gross taxes and other revenues available to the City from the Kingsway project would significantly overstate the net fiscal impact.

14.0 Social and Public Health Impacts Must Also Be Recognized

In addition to economic impacts, there are a range of potential social and public health issues associated with casino gaming that remain to be addressed with respect to the establishment of a new casino in Sudbury. A recent report from the Sudbury Health Unit, as well as other similar and supporting research undertaken by Toronto Public Health, identify a number of specific concerns relating to a possible increase in the prevalence of “problem gambling”. This research further identifies a number of mitigation strategies to be considered as to the location and required operating conditions of a new casino.³⁷

These are questions that have not yet been answered in either the PwC reports or elsewhere and should be addressed prior to making a decision on this project.

15.0 Economic Analysis Required Prior to Approving the Relocation of the Arena

In our opinion, a more detailed economic analysis is required to better understand the true impacts of relocating the arena outside of Downtown Sudbury to a proposed entertainment district, beside a casino, on the Kingsway. Some key questions that should be addressed include:

- What will be the loss of business and jobs in the downtown if the arena were to be relocated to the Kingsway?
- What would be the loss in attractiveness of the downtown as a business and residential location if the arena were to be relocated to the Kingsway?
- What new development (residential, office, retail, other “employment” type uses, etc.) could be attracted to the downtown with the development of a new arena?
- Will an entertainment district on the Kingsway site, including an arena, casino, hotel, restaurants and retail, etc. increase Sudbury’s draw from outside of the region?
- Is there sufficient market to support the proposed entertainment district on the Kingsway site?
- To what extent will the proposed entertainment district on the Kingsway site cannibalize existing businesses in Sudbury?

³⁷ Sudbury & District Health Unit Briefing Note, Re: The Health Impact of Gambling Expansion in Greater Sudbury (February 14, 2013)

- To what extent will the proposed entertainment district draw revenues away from commercial areas designated in the Sudbury Official Plan?
- Will there be sufficient economic benefits from relocating the arena to the Kingsway site to offset the loss of businesses to and attractiveness of downtown Sudbury?
- What is actually required in terms of site preparation and servicing with regards to the Kingsway site?
- What is the precise cost differential between developing the Kingsway site and the downtown site taking into consideration actual site preparation, servicing and site acquisition costs?
- How much parking would be required to support arenas in the downtown and the Kingsway site? Similarly, are there any other long-term municipal infrastructure costs related to the Kingsway site that have not yet been identified (e.g., street maintenance, public transit, etc.)?
- Is sufficient existing parking already available downtown to support the proposed arena and how far a walk would it be to reach the required parking amount? What would the difference in walking distance to parking be at the Kingsway site?
- Would the construction of additional parking in the downtown, as proposed, enhance the attractiveness of the downtown site?
- Would there be differences in traffic delays leaving an event between the downtown and Kingsway sites?
- To what extent would the casino, as part of an entertainment district, rely on local expenditures and to what extent would it enhance expenditures from outside of the community?
- What is the market for a hotel on the Kingsway site? Would a hotel on the Kingsway site cause the closure of other hotels in the City? Would a hotel on the Kingsway site impede the market for a new downtown hotel?
- How will the relocation of the Community Arena to the Kingsway site impact the market for a convention centre downtown?
- How will the Kingsway Entertainment District impact the market for a performing arts centre in Downtown Sudbury?
- Would a casino, as part of an entertainment district, detract from the City's ability to draw knowledge and creative workers and investment to the community?
- Would increased investment in the downtown, including an arena/events centre be better able to attract knowledge and creative workers and businesses to the community?

In addition to the various unanswered questions above, the production of more detailed financial data and other information is needed to prepare a proper economic impact study that considers all of the factors identified.

In our opinion, the redevelopment of the Sudbury Arena will have profound impacts on the community and the location decision will have an immediate and lasting impact on the local economy. If the arena is moved outside of the core, it will also shift economic prosperity outside of the downtown to another part of the City. If the Kingsway entertainment site is ultimately selected, the impact will be to transfer wealth from the downtown core, where it is enjoyed by a myriad of downtown businesses to a single landowner. Similarly, recognizing the remote location of Sudbury and the proximity to other existing/proposed casinos throughout Northern Ontario, a new and expanded casino complex at the Kingsway site is expected to derive the majority of its spending from local residents. This suggests that most revenues at the complex would simply be diverted from other parts of the City in terms of food, retail, accommodation and entertainment type expenditures, rather than relying on additional, or “net new” growth in revenues from visitors to the community from beyond the Region, as is the case with other major border casinos (e.g., Niagara Falls, Windsor, etc.).

While the economic and financial work that has been conducted to date provides a very general overview of the requirements of a new arena, questions remain as to the accuracy of some of the assumptions and data considered as part of the analyses prepared to date. Consequently, there is insufficient information to enable and support City Council in making an informed decision on the most appropriate location for this very important community resource.

The above questions need to be more fully answered as part of an economic and feasibility study related to the redevelopment and relocation of the Sudbury Arena, the relocation of the Gateway Casino and the proposal for the Kingsway Entertainment District.

In conclusion, the Proposed Kingsway Entertainment District has many economic drawbacks for the City and it is likely that its economic and financial costs would outweigh its benefits. As a result, we would strongly recommend that a more detailed economic analysis be undertaken, before additional staff and financial resources are invested by the City towards this proposal.

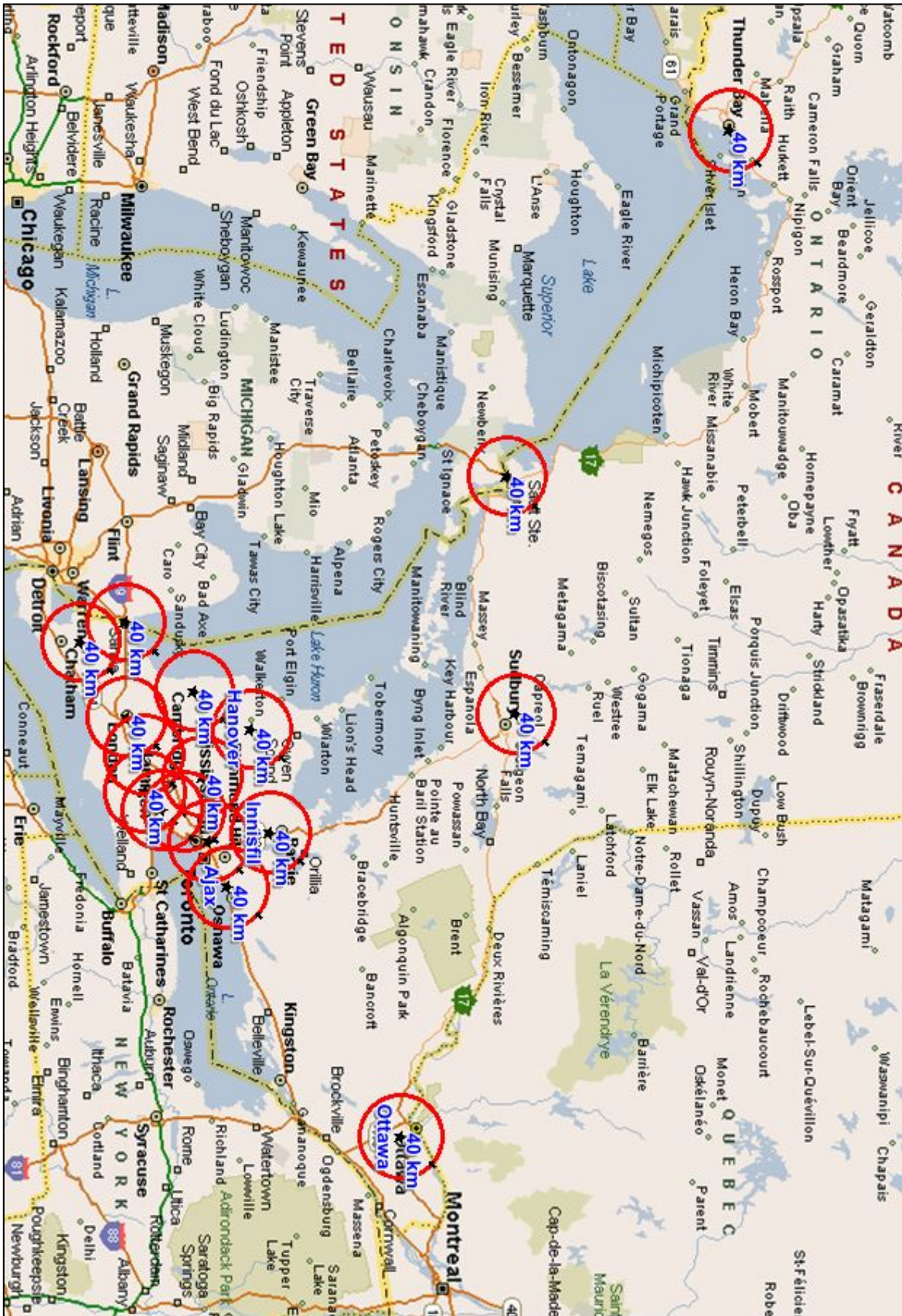
Appendix A: Background Gaming Data

Appendix A: Background Gaming Data

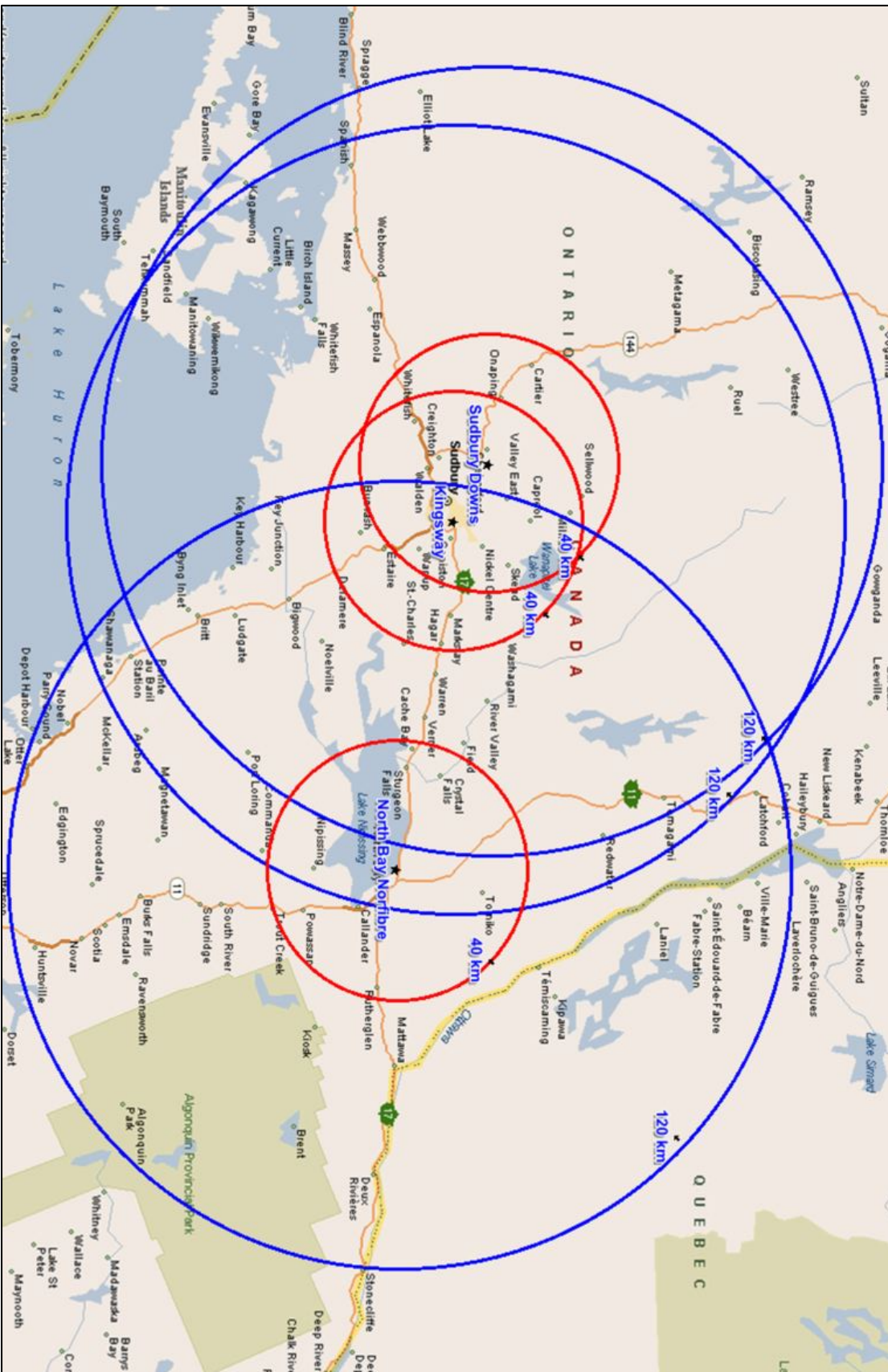
	Gaming Type	Slots	Tables	Estimated Casino or Slots W/in		Visits	Canadian Population within 40 km Radius		US Population within 40 km Radius		Total Population within 40 km Radius		Visits Per Population within 40 km		Total Win Per Visit		Slot Win Per Day Per Machine		Total Win Per Population	
Brantford	Casino	861	58	\$	101,000,000	1,300,000	1,070,322			1,070,322	1.21	\$	78	\$	225	\$		225	\$	94
Point Edward	Casino	450	21	\$	49,000,000	600,000	110,207		178,894	289,101	2.08	\$	82	\$	209	\$		209	\$	169
Sault St. Marie	Casino	434	11	\$	29,000,000	600,000	84,626		26,276	110,902	5.41	\$	48	\$	128	\$		128	\$	261
Thunder Bay	Casino	450	11	\$	51,000,000	800,000	123,999			123,999	6.45	\$	64	\$	217	\$		217	\$	411
Average		549	25	\$	57,500,000	825,000	347,289				2.07	\$	70	\$	201	\$		201	\$	144
Ajax	Slots	880	0	\$	209,500,000	1,800,000	3,118,074			3,118,074	0.58	\$	116	\$	652	\$		652	\$	67
Central Huron	Slots	123	0	\$	11,000,000	200,000	66,846			66,846	2.99	\$	55	\$	245	\$		245	\$	165
Centre Wellington	Slots	252	0	\$	42,000,000	500,000	806,408			806,408	0.62	\$	84	\$	457	\$		457	\$	52
Chatham-Kent	Slots	148	0	\$	13,000,000	200,000	121,133	51,169		172,302	1.16	\$	65	\$	241	\$		241	\$	75
Hamilton	Slots	804	0	\$	121,000,000	1,000,000	1,832,722			1,832,722	0.55	\$	121	\$	412	\$		412	\$	66
Hanover	Slots	196	0	\$	23,000,000	300,000	82,222			82,222	3.65	\$	77	\$	321	\$		321	\$	280
Innisfil	Slots	996	0	\$	125,000,000	1,100,000	586,212			586,212	1.88	\$	114	\$	344	\$		344	\$	213
London	Slots	738	0	\$	105,000,000	1,100,000	565,269			565,269	1.95	\$	95	\$	390	\$		390	\$	186
Milton	Slots	925	0	\$	151,000,000	1,100,000	2,896,686			2,896,686	0.38	\$	137	\$	447	\$		447	\$	52
Ottawa	Slots	1,236	0	\$	118,000,000	1,200,000	1,808,326			1,808,326	0.66	\$	98	\$	262	\$		262	\$	65
Sudbury	Slots	407	0	\$	42,000,000	400,000	162,490			162,490	2.46	\$	105	\$	283	\$		283	\$	258
Toronto (Woodbine)	Slots	2,995	0	\$	521,000,000	5,400,000	5,543,677			5,543,677	0.97	\$	96	\$	477	\$		477	\$	94
Woodstock	Slots	236	0	\$	27,000,000	300,000	552,213			552,213	0.54	\$	90	\$	313	\$		313	\$	49
Average		764		\$	116,038,462	1,123,077	1,395,560			1,399,496	0.80	\$	103	\$	416	\$		416	\$	83

Source: Based on Data from OLG 2016/17 Community Benefit Summaries. Win calculated by urbanMetrics based on the municipal share as reported in the OLG Community Benefits Summaries and the share formula.

40 KM Radii from OLG Casinos and Slots Facilities



40 and 120 Km Radii from Sudbury Downs Gateway Site and the Proposed Kingsway and North Bay Sites



Appendix B: Licence Plate Survey

urbanMetrics inc. was provided with license plate data from Sudbury Downs, the site of Gateway Casino Sudbury (formerly OLG Slots Sudbury) for four days in February of 2018 – Thursday February 8th, Friday February 9th, Saturday February 10th and Sunday February 11th. These were collected at during various time intervals throughout each day, from 6am to 12am. A total of 600 license plates were collected, allocated as follows:

- Thursday – 100 plates
- Friday – 150 plates
- Saturday – 200 plates
- Sunday – 150 plates

The output was then sent to the Ministry of Transportation (MTO), to sort based on Dissemination Area. After processing, MTO returned a total of 574 entries to urbanMetrics for analysis. These findings were plotted both by geography and distance from Gateway Casino Sudbury. The findings produced are shown in the table below:

Municipality	Number of Records	% Breakdown
Sudbury Census Subdivision (includes Chelmsford)	426	74.2%
West of Sudbury to Sault Ste. Marie (includes Elliot Lake and Manitoulin Islands)	54	9.4%
East of Sudbury to North Bay	32	5.6%
Greater Ottawa	8	1.4%
GTA	16	2.8%
All Other	38	6.6%
Total Plotted	574	100.0%

As shown, the overwhelming majority of visitors to the casino arrive from Sudbury, some 74.2%.

The table below shows the results presented as a function of distance from Gateway Casino:

Boundary	Number of Records	% of Total
Within 40km	426	74.2%
Within 120km and North Bay	505	88.0%
Beyond 120km	69	12.0%

As shown, 74.2% of visitors come from within 40km of Gateway Casino. A total of 88.0% of visitors come from within a 120km radius, or from the City of North Bay.

	Thursday		Friday		Saturday		Sunday	
	Number of Records	% of Total	Number of Records	% of Total	Number of Records	% of Total	Number of Records	% of Total
Within 40km	70	74.5%	97	70.3%	142	72.8%	117	79.6%
Within 120km and municipal boundary of North Bay	79	84.0%	120	87.0%	170	87.2%	136	92.5%
Beyond 120km	15	16.0%	18	13.0%	25	12.8%	11	7.5%

Additionally, as shown, the breakdown of visitors across the various dates surveyed was relatively consistent.

Appendix C: Cell Phone Data

Geofencing is a new technology that is being used by market researchers as an alternative to licence plate surveys and on-site surveys. It makes use of cell phone usage within a geographic area. Typically this involves identifying a small geographic area and tracking cell phone activity within the area. Different types of information can be obtained through this technology, including visitation patterns, place of origin and demographic data.

Through data available from the Bell cellular network, urbanMetrics was able to obtain data related to the home municipality of patrons visiting OLG Slots Sudbury (Now Gateway Casinos Sudbury). The data excluded employees at the site.

The data included persons visiting the site during the summer of 2017 (July, August, and September) and in February 2018. The summer data was used to mimic a period with high volumes of tourists to the Sudbury area, while the February data was used as a comparison with the licence plate survey results.

The data is more comprehensive than the licence plate survey data, in that it includes all patrons on the same cellular network, regardless of how they arrived at the facility and avoids many of the biases of the licence plate surveys that tend to over estimate non-local visitation.

Over the study period, the sample included some 2,637 patrons, of which 84% live within the City of Greater Sudbury and 90% live within 120 kilometres of the site.

OLG Slots Sudbury (Gateway Casinos Sudbury) Customer Place of Origin from Cell Phone Usage

	July 2017		August 2017		September 2017		Feb 8-11 2018		TOTAL	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent	Total	Percent
Greater Sudbury	676	85%	657	82%	799	86%	83	81%	2,215	84%
Other Within 120 Km + North Bay	49	6%	46	6%	48	5%	13	13%	156	6%
Elliot Lake	8	1%	7	1%	11	1%	3	3%	29	1%
Espanola	5	1%	6	1%	3	0%	2	2%	16	1%
North Bay	13	2%	12	1%	12	1%	4	4%	41	2%
Other	23	3%	21	3%	22	2%	4	4%	70	3%
TOTAL WITHIN 120 KM	725	91%	703	88%	847	91%	96	94%	2,371	90%
Outside 120 Km	74	9%	100	12%	86	9%	6	6%	266	10%
GRAND TOTAL	799	100%	803	100%	933	100%	102	100%	2,637	100%
Total Northern Ontario	733	92%	714	89%	868	93%	97	95%	2,412	91%

Good Afternoon

We are Rudy & Sheila Lafleur ward #4

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

This will be a well needed shot in the arm for the City of Greater Sudbury and hopefully encourage new & more growth

Thank you

Hello,

This email is to let it be known that I support the Kingsway/Arena project.

Regards,

Rodney

From: Jeannette Bergeron
To: <clerks@greatersudbury.ca>
Date: 3/15/2018 8:37 AM
Subject: Re-zoning

I fully support the re-zoning application for the new Arena and entertainment complex to be built on the Kingsway.


Let's move our city forward!

Jeannette Bergeron


Sent from Jeannette on my iPad

From: Caroline McDonald
To: <clerks@greatersudbury.ca>
Date: 3/15/2018 8:42 AM
Subject: I SUPPORT LOCATING ARENA & CASINO AT TNS

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Caroline McDonald


Sent from my iPad

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Leo G. Leduc

I SUPPORT LOCATING ARENA & CASINO AT TNS

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Carole Rodrigue

[REDACTED]
[REDACTED]

From: Rob
To: "clerks@greatersudbury.ca" <clerks@greatersudbury.ca>
CC: "mayor@greatersudbury.ca" <mayor@greatersudbury.ca>, "mark.signoretti@gr...
Date: 3/15/2018 12:36 PM
Subject: Kingsway ED and rezoning application

Good afternoon,

As a resident of Greater Sudbury, please take this submission as my opposition to rezoning to permit a public arena on approximately 11.96 hectares of land located on the Kingsway.

To explain why I feel this way please let me first tell you about myself. I am 34 years old and work as a locomotive engineer for CN Rail in Capreol. I was born in Sudbury and live at 384 Van Horne St. I am an avid outdoorsman and sports fan, also a Sudbury Wolves Season ticket holder. I choose to live in Sudbury although I can be equally employed across the province including the city of Toronto. I am a union representative with Teamsters Canada Rail Conference division 728 and I believe in fairness for all people. I hear the excuse of building this district on the Kingsway to keep young Sudburians in Sudbury but I can't agree with that. A vibrant downtown is the urban setting young people leave this city for and the Kingsway district jeopardizes this in that the proposed downtown projects may never come to fruition. And the Kingsway district may also fail. An arena located on the Kingsway can be looked at in the future but now is not the time. I am impartial to a casino. Please consider the following 2 sequence of events before approving this rezoning and moving forward.

1. Let Gateway build a casino and hotel on the Kingsway with Mr. Zulich. Move forward with the Synergy Centre, Art Gallery, and library downtown while continuing to operate the current Sudbury Arena. Time will tell if the Kingsway will become the destination as touted and warrants a new arena. It will also be known whether the downtown can handle losing the arena, that the loss will now be offset by the operating Synergy Centre and proposed hotel development. A small fraction of the \$100 million dollar arena price tag can be used to complete necessary renovations to the current arena to take us through the next 10 to 20 years while the process unfolds pleasing both downtown and Kingsway supporters in the process.

OR

2. Simply build a new arena as was proposed in the downtown core and save the old building as a heritage site to house an indoor market, performance centre, practice rink. Follow up with commitments to build parking structures in the core to enhance supply. Move the Synergy Centre project to the Kingsway location to bolster Gateway's casino and hotel and kick start Mr. Zulich's district. Arguably drawing the same number of people to his property as an arena.

There is an answer that the majority of Sudburians can support. It hasn't been found yet and what is currently in place does not work.

Thank you for reading,

Robert Greene


To the True North Strong (Kingsway Entertainment District) Planning Committee. We very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

Eric & Cynthia Lafleur

[REDACTED]
[REDACTED]
[REDACTED]

Sent from my Samsung Galaxy smartphone.

Hello Rene, Fern, Mark and all of council and our Major -

Can we not have a referendum on this?

It is a huge project that will affect every tax payer in our city. My property taxes have gone up 10X since I bought my first house in Sudbury, and I hear complaints every time I do a financial review. "my taxes are more than anyone else I know from Vancouver to Halifax".

So many people I know are so upset, the leading business owners in our community, the professional associations I belong to. The momentum is growing so loud. Just off the phone with a teacher at Rainbow who wants to have the teachers come to city hall to protest this.

Do you really want to go against the wishes of some of the largest private employers in our city, the entrepreneurs and families that build this city, the architects, accountants, planners, engineers, doctors and lawyers, judges, teachers, social activists and religious leaders of our community?

Who are you listening to?

This will shape the future of our city and I am sure the next election.

We have more than 2500 signatures on our petition that reads:

Dear Major and City Councillors – don't Gamble with our city! We say "no casino in Sudbury".

Casinos are bad social, economic and government policy.

The truth about casinos is that the community loses; the odds are stacked against us so don't be deceived.

A casino comes here to suck money out of our economy.

Casinos do not provide facilities at "no cost" to taxpayers. There is a cost, and it is wildly understated.

Research confirms the resulting social impact will include: money leaving our local economy, damaged finances, anxiety, depression & even suicide.

Take the time to learn the true costs by looking at the research.

Faith leaders, business owners, medical, health and addictions workers, economists, the legal profession, student and youth leaders, civic leaders, academics, community leaders, social activists, architects and planners, the members of the arts, culture & food community, trades professionals, and many others from across the Greater Sudbury area have spoken out against casino expansion and signed a joint statement in opposition.

5 x's the percentage of the population of our community signed the petition compared to the one against a casino in the city of Toronto. Why were they listened to and we aren't? If your citizens don't feel listened to and respected, this is a very dysfunctional situation.

I cannot understand why the council is not listening to the voices of community leaders about this important issue.

Very unfortunately, I am out of town the week of the 26th of March. I want to be heard and the people who have signed the petition want to be heard, we don't want a full blown casino! I studied this at university, I have mountains of research from associations across Canada and North America and have the support of one of the richest people in the world, Warren Buffett! Why do you refuse to listen to us?

We want a functioning city, one not drowning in debt, who refused to listen to our business leaders, the Health Unit, the Chamber of Commerce, The Canadian Safety Council, Livable Sudbury, the Inter-faith committee and educators.

It really makes me wonder why. The former auditor in me is wondering if there are conflicts of interest yet to be found out.

We keep doing this urban sprawl and the infrastructure costs are killing the few that are left. It scares me we will end up like Smooth Rock Falls. Can't give your house away and the smaller # of people supporting growing costs.

With continued urbanization a global phenomenon, why on earth would a community like ours, an aging one, one at serious risk of continued declining population and it is becoming known as a hub for drugs and human trafficking. Where do they launder their dirty money? CASINOS! Read the papers.

Do you really think that the Greatest Investor of our time, Warren Buffett is wrong when he says "Our governments should not be preying upon its' citizens to create more addicts by raising money from people who can't afford to gamble, by promising them a dream that isn't going to come true!"

Respectfully,

Ruby Lougheed Yawney

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

March 15, 2018

Re: Application to Amend the City of Greater Sudbury's Zoning By-law 2010-100Z
City of Greater Sudbury File No. 751-6/17-27

1916596 Ontario Ltd. (hereinafter referred to as the "applicant" or the "land owner") has applied to amend the City of Greater Sudbury's Comprehensive Zoning By-law 2010-100Z for lands described as being Part of Lot 9, Concession 4, Part of Parts 10 & 11, and Parts 12 and 13 of Plan 53R-19391 in the geographic township of Neelon. The application intends to amend the zoning by-law by adding a new site-specific use, "recreation and community centre" in order to permit the establishment of an arena/events centre. The amendment also proposes to include site-specific height requirements for structures, and no minimum requirement for the interior side-yard setback.

Presently, the lands subject to the proposed zoning by-law are designated "General Industrial" in the City of Greater Sudbury's Official Plan. The General Industrial designation permits a range of industrial land uses and complimentary and ancillary uses as of right, and allows for heavy industrial activities subject to an amendment to the zoning by-law.

The lands subject to the proposed zoning by-law amendment are presently zoned "M1-1" in the City of Greater Sudbury's comprehensive zoning by-law #2010-100Z, as amended by a site-specific by-law in 2014. Presently, the zoning permissions on the subject lands include a range of industrial uses, and some commercial uses including office uses, bulk retail, warehouse uses and a commercial recreation centre and hotel.

The lands subject to the proposed zoning by-law amendment and other lands in the area under the control of the land owner were previously subject to a draft approved plan of subdivision, which received draft approval subject to conditions by the City of Greater Sudbury in 2010. The application for a plan of subdivision sought to create 33 blocks (12 blocks for light industrial service commercial use; 10 lots for industrial use; and 11 for heavy industrial uses. Two blocks were also provided for stormwater management purposes) in accordance with the City's Official Plan.

That draft plan of subdivision appears to have lapsed in October, 2016 – although the City of Greater Sudbury continues to treat the draft plan as if it had not lapsed. Determination as to the actual status of the draft plan of subdivision may need to take place at some point – however, comments and analysis provided here will be done so based on the City's understand that the draft approved plan of subdivision remains active

The applicant is seeking to add a "*recreation and community centre*" land use permission to the existing zoning for the subject lands, to facilitate the construction of an Arena. Recreation and community centre is described in the City's comprehensive zoning by-law 2010-100Z as, "*A building or structure, or part thereof, owned or operated by a private club, a non-profit or charitable institution or a public agency including a facility developed or operated as a public-private partnership, where*

facilities are provided primarily for athletic or recreational activities or events, and includes without limiting the generality of the foregoing, an arena and a public pool."

Further, the By-law defines "Arena" as, *"A building housing ice making equipment and infrastructure capable of enclosing an artificial ice surface intended for year round recreational use and may include uses such as special events and competitions, circuses, concerts, conventions, weddings/banquets/anniversaries, auctions, restaurants, flea markets and trade shows or exhibits with a retail component."*

In a letter to the Manager of Development Approvals, City of Greater Sudbury, from the applicant's agent, Karl Tanner, MCIP RPP, dated December 5, 2017 (hereinafter referred to as the "Tanner December 5/17 letter") it is noted that the City of Greater Sudbury has completed a Market Analysis and Business Case for the creation of a new 5,800 seat arena/events centre. This reference appears to be the two reports prepared by PricewaterhouseCoopers (PWC) – the "Proposed Sports and Entertainment Centre – Feasibility and Business Case Assessment" (February 21, 2017) and the "City of Greater Sudbury Event Centre Site Evaluation" (June 2017).

On June 27, 2017, Council for the City of Greater Sudbury selected the lands subject to this proposed amendment as the preferred location for a new arena/events centre, which is intended to replace the existing Sudbury Community Arena, located at 240 Elgin Street. Through Council's selection of the applicant's property for a new arena/events centre, the land owner was invited to make this application to amend the City's zoning by-law.

The analysis contained in this letter will demonstrate that the application to amend the City's zoning by-law to permit a *"recreation and community centre"* on the subject lands does not have regard to Section 2 of the Planning Act, is not consistent with the Provincial Policy Statement, 2014, is not consistent and does conflict with the Growth Plan for Northern Ontario, does not conform to the City of Greater Sudbury's Official Plan, is not in keeping with the development direction of the City as expressed through public consultation that informed and led to the acceptance by the City of the Downtown Master Plan and "From the Ground Up", the City's economic development plan, and it does not represent good planning.

The Application in Context of the City's Planning and Development Framework as it Pertains to an Arena/Event Centre

The City of Greater Sudbury has long recognized the importance of a centralized major multi-use community centre. Presently, that centre is the Sudbury Community Arena, which serves City residents as a venue for accessing local sports and entertainment; as a recreation centre; as a centre that hosts cultural and civic activities, such as the July 1st multicultural celebration and the annual November 11th Remembrance Day commemoration; as a centre for trade-shows and conventions; as a centre for evacuation in times of crisis; and as a general meeting facility.

In 2005, the City of Greater Sudbury adopted its Official Plan, which acknowledged the importance of community facilities generally, and the Sudbury Community Arena specifically, as uses which would help attract and retain needed residential development in the City's downtown.

Since the adoption of the City's Official Plan, there has been a growing acknowledgement of the need for a new community events facility to replace the existing Sudbury Community Arena. The City initiated studies to assess the viability and costs of repairing the existing facility, which was built in 1951.

In 2010, the City of Greater Sudbury initiated the Downtown Master Plan – a 3 year long planning process involving hundreds of local business, academic, and civic stakeholders, including downtown residents and those who shop, recreate and work in the City's downtown core. This planning initiative led to the Downtown Master Plan, received by Council in February, 2013. The Downtown Master Plan acknowledged the importance of public recreation facilities such as the Community Arena in the downtown, and identified a potential location for a new multi-use facility that would work together with other new facilities, such as a convention centre and commercial hotels, to create better circumstances for economic and residential development.

In 2015, the Greater Sudbury Development Corporation (GSDC) led a municipal-wide public consultation process that engaged with a very broad range of stakeholders, including citizens, business and industrial stakeholders, the academic community, environmental organizations. This process culminated in a new economic development strategy for the City, "From the Ground Up – gs2025", received by Council in April 2016. This new economic development strategy recognized the importance of the City pursuing a major, centralized community recreation and events facility to be located in the City's downtown core – the location that could best capitalize on economic development spin-offs while benefiting local businesses and incenting residential development.

In March, 2017, Greater Sudbury Council accepted a report by PricewaterhouseCoopers (PWC) that recommended the City replace the existing Sudbury Community Arena with a new facility, and that a site selection process be undertaken to determine which sites in the City would be the most appropriate for a new venue. PWC returned to Council on June 27, 2017 with a short list of 4 sites for consideration of Council. One site was located in the City's downtown core; two other sites were located in or near to the South End Regional Centre; a fourth site was located in an under-utilized industrial area on the eastern urban fringe of the former City of Sudbury – the Kingsway site. After significant discussion regarding how the Kingsway site could leverage new entertainment-oriented development on private lands owned by the applicant, Council ultimately selected the Kingsway site as the location for a new arena/events centre.

Site Selection for the Kingsway Not in Keeping with Planning and Development Documents

In making its decision in favour of the Kingsway on June 27, 2017, Council ignored the long-established directions of the City's Official Plan, Downtown Master Plan and Economic Development Plan – plans which, as a foundation, acknowledged the importance of a centralized community recreation and entertainment facility in the form of a Community Arena located in the City's downtown core. In succession, these plans built on that foundation, and anticipated a new facility, to be put to the same

or similar, if expanded, use as the existing Sudbury Community Arena, in order to better achieve creating a healthy, sustainable community and economic development goals.

No Such Thing as the “Kingsway Entertainment District”

Although the opportunity for the Kingsway site to potentially become a new entertainment district was cited by some on Council as rationale for selecting the Kingsway site, it should also be noted that prior to June 27, 2017, the City had never expressed an interest in creating a new hub of entertainment facilities – including publicly-owned facilities in the form of a Community Arena – anywhere other than in the City's downtown. Importantly, even as of today – almost 8 months after selecting the Kingsway site - the City still has not moved towards updating planning documents to identify any desire to create what is now being referred to as the *“Kingsway Entertainment District”*. The applications that have been filed with the City of Greater Sudbury by the applicant are intended to permit a new arena/events centre, parking lot and casino facility as site-specific exceptions to General Industrial land use permissions, but there has been no comprehensive initiative to change the land use designation on the property that would better acknowledge the site as an entertainment hub, or to develop policies in the Official Plan for how development in the district is to occur.

As it stands today, the *“Kingsway Entertainment District”* is really nothing more than a conceptual idea for an existing industrial area.

What this means is that evaluating this application within the greater context of an entertainment hub is premature, and not in keeping with the City's Official Plan, which provides citizens and decision-makers alike with the true development vision for the City of Greater Sudbury. The conceptual *“Kingsway Entertainment District”* and any “planning” which might have taken place to advance this vision (including the so-called “integrated site plan” process – a process led by the City with two business partners, that took place outside of the context of the Planning Act and assessed uses which are not currently permitted by the Official Plan) can have no standing in the evaluation of this application and should be ignored by decision-makers.

Recreation and Community Centre – Not a Tourism Use

It is worth noting that in the letter from the applicant's agent to the General Manager dated Tanner December 5/17 letter, the land owner's consultant provides a land use analysis for the application that appears to be, in large part, based on the mistaken belief that the application to amend the zoning by-law will permit what appears to be primarily a “tourism” use. With regards to tourism and tourist use, the applicant's planner writes,

“Our analysis suggests that the proposed development is consistent with the intent of the Official Plan in the following ways, they are:

- *Section 1.3.2, Economic Development – The proposed development promotes the attraction of a diverse population through the creation of a curious, adventuresome city, by introducing a new tourist-based destination.*

- *Section 4.0, Employment Areas – The proposed development provides a wider variety of serviced employment lands, also allowing for a diversification of the employment base; and, the proposed development ensures the efficient use of currently underutilized industrial lands for the development of a tourist-based destination.”*

This analysis appears to be based on a fundamental misunderstanding of what a “recreation and community centre” is and is not. Through discussion here, I will show that a “recreation and community centre” in the form of an arena/events centre is an institutional use, as per the City’s Official Plan, and a “public facility”, as per the Provincial Policy Statement, 2014, and as such is intended to be used primarily by residents of the City of Greater Sudbury. I will also show that while it is expected that there will be some out-of-town guests (“tourists”) who will use this facility, that cannot change an evaluation based on the primary and fundamental use of the public facility – namely, to provide service to residents of the City of Greater Sudbury.

Tourism in the City of Greater Sudbury’s Official Plan

The City of Greater Sudbury's Official Plan acknowledges the important role that tourism plays in the City’s economy. The Plan identifies Centres as “*nodes of retail, tourism, business, education and government services.*” (Section 4.2). For the purposes of the City’s Official Plan, “Centres” consist of the Downtown, Regional Centres and Town Centres. The industrial area on the Kingsway where lands subject to this application are situated are not within a “Centre”.

Section 5.2.6 of the Plan identifies that resort and shoreline commercial uses in rural and waterfront areas are permitted as a means of expanding the tourism sector. The lands subject to this application are not in a rural and waterfront area.

Part VI of the Plan indicates that, “*A diverse and vital economy is an essential quality of a Healthy Community. Greater Sudbury has adopted an economic development strategic plan that identifies several key engines of growth. In addition to mining and supply services, other targeted sectors include tourism, arts & culture, health care services and research, and the development of an environmental services sector that will build upon the City’s well-established land reclamation and lake water quality programs.*” It should be noted that the “*economic development strategic plan*” referred to in this policy has since been replaced by a new, more up-to-date economic development plan, “*From the Ground Up – gs2025*”. “*From the Ground Up – gs2025*” also emphasizes the key role that tourism plays for economic development in the City. That Plan identifies a number of actions which the City and other stakeholders should consider undertaking to better create and promote opportunities to expand our tourism sector, including:

- 4.2.1 – *Implement innovative alternative transportation, transit, and parking options focused on improving visitor circulation in the city connecting major tourism and retail/commercial nodes;*

The zoning by-law amendment to permit an arena/events centre on the Kingsway, to be accessed primarily by motor vehicles, while removing the community arena from the downtown will not be helpful and is anticipated to be harmful in achieving this outcome.

- *4.2.2 – Co-ordinate regional planning, economic development, and tourism interests to advocate for the development of more efficient and modern transportation infrastructure in the northern Ontario;*

Putting a new arena/events centre on the Kingsway, where it will be poorly serviced by public transit, and opportunities to walk and bike, will not assist in achieving this outcome and will not help lead to more efficient, modern and active transportation systems in the City.

- *4.3.2 – Leverage assets and programs of Sudbury Tourism to increase Greater Sudbury's appeal for residential attraction;*

The presence of the Sudbury Community Arena in the City's downtown is acknowledged as a facility that is part of a strategy to attract and retain residential development in the City's core. Replacing the existing downtown arena/events centre with a new facility in an industrial area will frustrate the downtown residential development strategy and will not help achieve this goal.

- *Goal Six: A nationally recognized centre of artistic excellence, vibrancy and creativity – There is overwhelming consensus that arts, culture and heritage provide value to communities in the form of quality of life, downtown revitalization, sense of community, attraction and retention of creative professionals, economic development and tourism. By fostering an environment that supports cultural pursuits and creative individuals we will benefit in these areas.*

In Goal Six, "From the Ground Up – gs2025" clearly contemplates the linkages between a vibrant arts, culture and heritage sector with the revitalization of the downtown and the promotion of tourism. A new arena/events centre on the Kingsway in an industrial area will not help the City achieve this goal; removing the Sudbury Community Arena from the downtown would likely lead to the opposite of downtown revitalization.

- *Goal Seven: One of Ontario's top tourism destinations states in part, "Tourism is also an important sector of Greater Sudbury's economy, and all citizens have the opportunity to be good ambassadors, promoting the beauty of our city and encouraging visitors to come... One of the key priorities for Greater Sudbury in the tourism sector is based on the range of events that the community offers. The city, with its reputation as a regional capital, has had success hosting a series of festivals throughout the year...During the consultation process it was suggested that the development of a new arena/entertainment complex could help unlock the potential for the continued growth and economic prosperity of the community. This would complement Greater Sudbury's existing festivals with an additional venue for other concerns, entertainment events, live performances, and sporting events, not to mention its potential for expanded convention business. There are still a number of opportunities that exist in the tourism sector that Greater Sudbury can leverage to help make it one of Ontario's top*

destinations. For example, the Downtown Sudbury Master Plan calls for promoting tourism in the downtown core and creating destination attractions such as a “Signature Arts District” that will draw visitors from across the region. Consideration should be paid to investing in the necessary infrastructure to support the added visitors to the area. Continued growth and diversification of the region’s retail sector will also maintain and enhance Greater sudbury’s regional capital status as well.”

An a new arena/events centre on the Kingsway in an industrial area does not further any portion of Goal 7.

- *7.1.1 – Develop a multi-purpose facility (or facilities) for arts, culture, business and sport in the Downtown core, with consideration for the following high-priority uses:*
 - *Conference facilities*
 - *Performing arts centre*
 - *Arena/sports complex*
 - *Art gallery*
 - *Accommodations*

Shuttering the existing Sudbury Community Arena in the City’s downtown core in favour of a new facility in an industrial area on the Kingsway is contrary to this Action identified in “From the Ground Up – gs2025” in Objective 7.1 – Invest in Facilities, Spaces, and Initiatives Needed to Support the Growth of Tourism.

- *7.2.8 – Work with Transit and other agencies to improve choice and quality of connections between attractions.*

The development of a new arena/events centre in a car-dependent industrial area on the Kingsway will not assist with achieving this desired outcome.

- *7.3.1 – Promote the “scenic sights, urban delights” brand for Sudbury Tourism in order to distinguish the city from its competitors in Ontario.*

Removing the existing Sudbury Community Arena from the downtown’s urban fabric in favour of locating a new arena/events centre in an industrial area surrounded by surface parking facilities will not assist with marketing a brand that focuses in part on the City’s “urban delights”.

- *Conclusion – “Our city will be recognized as one of Ontario’s top tourism destinations, offering world-class attractions, high caliber accommodations and unieque events and activities for all types of travelers. The implementation of the Downtown Sudbury Master Plan will help transform the downtown core into a destination featuring attractions that will draw vidistors from across the region, the province and around the world. Investment in facilities, spaces and initiatives will support the growth of tourism along with prioritization of tourism destination development and promotion initiatives.”*

Locating a new arena/events centre in an industrial area will not assist in achieving this desired outcome. It is important to note that the industrial area where lands subject to this request for zoning amendment is located is not identified as a priority for tourism initiatives in our Economic Development Plan – indeed, this area on the Kingsway is not even mentioned.

Section 17.6 of the Official Plan indicates that, *“Council in conjunction with the Greater Sudbury Development Corporation and other stakeholders as appropriate, h) Will continue to develop tourism infrastructure and promote the City as an outstanding vacation destination and place to live and work by, ii) selectively enhancing arts and cultural amenities to fit unique heritage and local strengths; v) creating a comprehensive marketing strategy to bring Greater Sudbury’s tourism and lifestyle advantages to key markets.”*

The application to permit an arena/events centre on the Kingsway is not in keeping with these Plan policies that seek to leverage existing local strengths and our tourism marketing strategy. The urban focus of the *“scenic sights, urban delights”* brand plays up on one of our City’s local strengths – a vibrant and dynamic arts and entertainment hub in our downtown core. By shifting a major event hosting facility from the downtown to an industrial area on the Kingsway, we would diminish opportunities for local synergies in the development of tourism infrastructure.

Application Not in Keeping with Tourism Promotion Policies and Programs

If the subject application were intended to be evaluated through the lens of tourism, what is clear is that putting an arena/events centre in an industrial area, as contemplated by this application, would not be in keeping with the City’s Official Plan and Economic Development Plan. The policies in these two City plans as they relate to tourism clearly do not support the establishment of a tourist-oriented arena/event centre in an industrial area on an urban fringe of the City. Instead, there is a strong policy direction in these Plans which suggest that an arena/event centre would be properly located in the City’s downtown core, where it can act as a facility that leverages and synergizes with other tourist-based attractions in a way that is accessible by active transportation and transit.

However, as indicated earlier, the proposed *“recreation and community centre use”* should be primarily evaluated as an institutional use – one to be used primarily by the citizens of our City, as it is not expected to generate a significant amount of tourism. However, if the small tourism component is deemed to be an important consideration, then this application to permit an arena/events centre on the Kingsway in preference to the City’s downtown should be refused by Council.

What is a *“recreation and community facility”*?

The Provincial Policy Statement, 2014, describes *“public service facility”* as *“lands, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs, and cultural services.”*

A recreation and community facility is a public service facility. Public service facilities are institutional land uses, and although they may include commercial activities (such as paid entertainment) and small-scale commercial uses (food vendors, ticket sales, etc.), the primary purpose of institutional uses is to perform functions and provide services that are of importance to citizens and the municipal corporation.

Locally, the Sudbury Community Arena is probably the best-known example of this kind of multi-use and multi-functional public service facility.

As the application intends to permit a *“recreation and community centre”* as a permitted use on the subject lands, the proposed use must be assessed as a *public service facility*.

Evaluating a *“recreation and community centre”* as a *Public Service Facility*

The City’s Comprehensive Zoning By-law 2010-100Z defines *“Institutional Use”* as *“A children’s home, a day care centre, a place of worship, a hospital, a private club, a non-profit or charitable institution, a group home type 1, a group home type 2, a special needs facility, a recreation and community centre, an arena, a public museum, a public library, a public business, a public fire hall, a public or private school other than a trade school, or any public use other than a public utility.”*

The By-law defines *“recreation and community centre”* as *“A building or structure, or part thereof, owned or operated by a private club, a non-profit or charitable institution or a public agency including a facility developed or operated as a public-private partnership, where facilities are provided primarily for athletic or recreational activities or events, and includes without limiting the generality of the foregoing, an arena and a public pool.”*

The By-law defines *“Arena”* as *“A building housing ice making equipment and infrastructure capable of enclosing an artificial ice surface intended for year round recreational use and may include uses such as special events and competitions, circuses, concerts, conventions, weddings/banquets/anniversaries, auctions, restaurants, flea markets and trade shows or exhibits with a retail component.”*

None of these definitions refer to *“tourism”* – although a *“recreation and community centre”* in the form of an *Arena* can and will nevertheless attract some people from areas outside of the City. However, the primary function of this use is clearly one that serves the residents of the City of Greater Sudbury.

With operating losses projected by PWC to be approximately \$800,000 annually, this *“recreation and community centre”* use in the form of an *arena* will be a public service facility that is clearly subsidized by a government, in keeping with the PPS 2014 definition of *“public service facility”*.

Existing Land Use Permissions

Through application 751-6/13-35, the subject lands were rezoned in 2014 to permit the development of a complex with office, hotel, bulk retail, warehouse, and commercial recreation centre uses. The

City's Zoning By-law 2010-100Z defines "*recreation centre, commercial*" as, "*An establishment where participatory athletic, recreational or physical fitness facilities are provided for gain or profit, and includes without limiting the generality of the foregoing, a commercial fitness centre and exercise spa or club, a commercial ice or roller skating rink, a commercial squash, tennis or golfing facility and a commercial outdoor recreation area, but does not include a riding stable, place of amusement or amusement park.*"

Although the letter to the Tanner December 5/17 letter indicates that the "*development of a 'recreation and community centre' in the form of an arena and Event Centre...is complimentary to...current permitted uses,*" this assertion is unproven. The type of facility currently permitted on the subject lands as a "*recreation centre, commercial*" appears to be something of much smaller scale than a public facility in the form of an arena events centre that is subsidized by the City. An "*Arena*" is not permitted.

There has been no economic analysis undertaken which has led to the conclusion that an arena/events centre of the scale proposed here (5,200 seats for an Ontario Hockey League game) represents a profitable commercial investment. The only analysis undertaken at this point, by PWC, determined that OHL-style arena/event centres almost always require public subsidy for long-term operations, and as such are not profitable on their own.

Comparing the existing zoning permission for a "*recreation centre, commercial*" to the new permission now being sought for a "*recreation and community centre*" is unhelpful for any land use evaluation of the application, since the likelihood of both types of facilities occurring on the subject lands is extremely low – and given that the City has made it clear that it plans to purchase the subject lands, it's almost a near certainty that a for-profit "*recreation centre, commercial*" will never be established on these lands.

Institutional Uses and the City's Official Plan

This application pertains to the addition of a new use on lands designated "General Industrial". The new use is an institutional use in the form of a "*recreation and community centre*", which is a *public service facility*, as per the Provincial Policy Statement, 2014.

The City's Official Plan includes policies for institutional uses within the Employment Areas section, and specifically in Section 4.4. While the Plan establishes a site-specific land use designation for some institutional uses – mostly for major health and education facilities – it acknowledges that institutional uses will occur within other land use designations, and that "*Institutional uses are permitted throughout the municipality in accordance with the needs of area residents and policies set forth below.*" Indeed, the Sudbury Community Arena – an institutional use – is located on lands that are designated "Downtown" in the City's Official Plan, and zoned C-6 – which allows for institutional uses.

Policy 2 of Section 4.4 is the only relevant section of 4.4 that would apply to and provide guidance for this land use application to amend the zoning by-law to permit a "*recreation and community centre*" – an institutional use – on the subject lands. Policy 2 of Section 4.4 indicates, "*2. In considering the*

establishment of new institutional uses or the expansion of existing facilities on lands not specifically designated for institutional purposes, Council will ensure that:

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

Institutional Uses on the Subject Lands

The City of Greater Sudbury's Official Plan designates the lands subject to this application as "General Industrial". General Industrial policies are also found within Section 4, "Employment Uses", of the Official Plan, and specifically within Section 4.5.1. Policy 1 of 4.5.1 indicates that, *"Permitted uses may include manufacturing, fabricating, processing and assembling of industrial and consumer products, repair, packaging and storage of goods and materials, and related industrial activities."* The use of the words *"may include"* in Policy 1 seems to imply that this is not a comprehensive list, and that other appropriate uses could be permitted, including institutional uses.

It may very well be appropriate for some kinds of institutional uses to locate on lands designated "General Industrial". For example, the City's recycling centre at 1825 Frobisher Street appears to be located on lands that are designated "General Industrial".

However, it would be an error to determine that by virtue of language in the Official Plan that indicates, *"Institutional uses are permitted throughout the municipality in accordance with the needs of area residents and policies set forth below,"* that it is implied that all areas of the municipality are appropriate for all institutional uses, subject to policies found in Section 4.4 of the Plan.

Further direction with regards to this situation is found in Section 20.5.2 of the Official Plan, which pertains to Rezoning Applications. Section 20.5.2 indicates, *"It shall be the policy of Council to ensure that the Zoning By-law and amendments thereto conform with this Plan. To this end, it is the intent of Council to evaluate each rezoning application according to all applicable policies – simple conformity with land use designation does not automatically guarantee a rezoning to the proposed use."*

Clearly, a more significant level of analysis is needed prior to determining whether a proposed new institutional use is appropriate in a specific location.

Note, too, that Section 4.4 does not indicate that institutional uses are permitted within every land use designation – it simply says *"throughout the municipality"*.

If one were to interpret Section 4.4 as applying to lands within every land use designation, the following situation would seem to permit institutional uses in locations that are completely inappropriate:

Scenario.

The City's Official Plan prohibits new development within floodplains. Floodplains occur in multiple land use designations, throughout the City, including Living Area 1 and the Parks and Open Space designation. An interpretation of Section 4.4's *"throughout the municipality"* which suggests that institutional uses can locate in any land use designation, subject only to items addressing items a) through f) of Policy 2, would lead to the absurd outcome that a new recycling centre, place of worship or recreation centre would have a valid land use permission within a flooding hazard, subject only to an assessment of the following (none of which have to do with environmental impacts or natural hazards):

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

At the Planning Committee meeting of January 11, 2018, planners for both the City and the applicant advised Planning Committee that this application was in conformity with the Official Plan based on the sentence found in Section 4.4 of the Official Plan that indicates *"Institutional uses are permitted throughout the municipality in accordance with the needs of area residents and policies set forth below,"* and presumably with consideration given to items a) through h) of Policy 2.

Given the significant direction of the Official Plan, which must be considered with regards to consistency with the Provincial Policy Statement, 2014 and the Northern Growth Plan, I submit that the analysis provided by the planners to Planning Committee on January 11, 2018 does not stand up to the strong policy direction contained in these three documents that would lead considered decision-makers to determine that an industrial area on the fringe of an existing urban centre is not the appropriate location for a public facility in the form of an arena/event centre.

Council, when making its determination, must consider all of the policies in its Official Plan, including Section 20.5.2, which specifically applies to rezoning applications. Official Plan policies must be read in conjunction with both the Provincial Policy Statement, 2014 and the Northern Growth Plan, as both of these policy documents have been issued by the Province since the approval of the City of Greater Sudbury's Official Plan.

Official Plan Conformity

"1.2 – Vision

The Official Plan functions as much more than a land use planning document – it also encompasses our objectives related to social, economic and environmental matters. The vision statements below

reflect the collective aspirations of those who live in Greater Sudbury by drawing on past community initiatives and public consultation.”

-City of Greater Sudbury Official Plan

*“...a policy statement is a conscious or stated choice – a kind of **public promise** - to take a consistent and fair approach to similar circumstances in the future and to make decisions (or have others who hold similar authority make decisions) that **will advance the desired objectives of the policy**. Like an unkept promise, a policy observed ‘more in the breach’ is of little true value.”*

-Ontario Municipal Board Member B.W. Krushelnicki, *Material Handling Problem Solvers Inc. v. Essex (Town) Marshfield Woods, the Hearn Group* [2002] O.M.B.D. No. 1133

The application does not conform to the following policies of the Official Plan:

Section 4.5.1, General Industrial

Section 4.5.1 of the Official Plan reads,

“Policies

- 1. Permitted uses may include manufacturing, fabricating, processing and assembling of industrial and consumer products, repair, packaging and storage of goods and materials, and related industrial activities.*
- 2. Complementary uses, such as administrative offices, which do not detract from, and which are compatible with, the operation of industrial uses are also permitted.*
- 3. General Industrial uses must have minimal environmental impacts. Any use which may impact surrounding areas and cause nuisance will be appropriately buffered and screened.*
- 4. Where development occurs in areas that are not fully serviced, only dry industries that generate less than 4,500 litres of wastewater a day may be permitted.*
- 5. Heavy industrial uses may also be permitted by rezoning.”*

A “recreation and community centre” use in the form of an Arena on this site does not conform to the Official Plan. It is a public service facility as defined by the PPS, 2014, and as such should be strategically located in an area of the City that promotes cost-effectiveness and better facilitates service integration. A public service facility of this nature should also be easily accessed by all citizens, including via public transit and active transportation.

An industrial area is not an appropriate location for this type of public service facility. The City of Greater Sudbury’s Official Plan directs this sort of facility to an alternate land use designation via the following policies.

- 1.4, Context

“The heart of Greater Sudbury, its most urban place, is and will be the Downtown. With the changing role of downtowns, there is a continuing need for appropriate policies and programs to

enhance the Downtown as a location of government, commerce, cultural and entertainment facilities. Residential development in and around the Downtown is needed to support new and expanded facilities and amenities."

This part of the Official Plan's context identifies the Downtown as having a continuing need for programs that enhance the location for a number of uses, and in particular cultural entertainment and residential uses. The provision of an arena/events centre in the Downtown would enhance and support these uses.

- 4.2.1, Downtown Sudbury

"Downtown Sudbury forms the historic core of the amalgamated City, retaining its important function as a centre of retail, arts and culture, government and business services. The Downtown services a large catchment area that extends beyond Greater Sudbury. Compact and walkable, the Downtown possesses a distinct built form that sets it apart from other urban areas, offering unique opportunities to protect, develop and sustain its role as the vibrant hub of a dynamic city."

This policy identifies the Downtown as the heart of the amalgamated City. It indicates that the Downtown serves a catchment area that extends beyond the City. A distinct built form that more easily promotes the use of active transportation exists in the Downtown like nowhere else in the City. To develop and sustain the Downtown's role as a vibrant hub of a dynamic City, the Plan recognizes the importance of the Downtown for the provision of various services to the community and beyond, including retail and business services – and noteworthy for our discussion pertaining to an Arena, arts and culture services as well.

- 4.2.1, Downtown Sudbury

"Council will develop the Downtown as a creative district by promoting arts and culture, encouraging public art initiatives, and partnering with the non-profit sector and other levels of government. The development of a performing arts facility in the Downtown core will be a key priority."

While the "Kingsway Entertainment District" may be a concept plan that has yet to be identified in any of the City's planning documents, our Official Plan does recognize the Downtown as a creative district for arts, culture and entertainment. No other part of the City is recognized as such. An arena/events centre in the Downtown contributes to our existing Downtown Entertainment District.

- 4.2.1.1, Downtown Residential Development

"Amenities such as the Farmer's Market, Sudbury Theatre Centre, Greater Sudbury Public Library, Sudbury Arena and the Centre for Life contribute to the appeal of the Downtown. In order to make it more attractive as a place of residence, additional amenities necessary to enhance the livability of the Downtown will be identified."

This Plan policy specifically identifies a downtown arena as part of a strategy to promote residential development in the downtown by enhancing the livability of the area. The promotion

of residential development in our Downtown has been identified by the Official Plan as a desirable objective, based on the well-understood principle that vibrant and dynamic downtowns are ones where people live, work, shop and play. The removal of the Arena from the downtown would be contrary to the downtown residential promotion strategy outlined here.

- 4.2.1.2, Downtown Urban Environment

"The Downtown offers a unique urban environment that is characterized by its distinct built form, heritage resources, street configuration, pedestrian spaces, and linkages to neighbourhoods and amenities such as Bell Park. The Downtown plays a key role in defining the City's image and quality of place, perceptions that are essential to the success of a number of City initiatives."

The Plan acknowledges the important role that the Downtown plays in the public perception of the City, and how that perception is used to achieve successful outcomes for City initiatives, including residential and economic development initiatives. The downtown Arena helps form a part of that perception.

- 4.2.1.2, Downtown Urban Environment

"It is a policy of this Plan to preserve those aspects of the Downtown that contribute to the image, character and quality of life in the City, including natural features, landmarks, design attributes and heritage resources, linkages to existing trails, pedestrian walkways and other desirable elements of the built environment."

Building on the previous policy regarding the importance of public perception, this Plan policy clearly identifies that those aspects of the Downtown that contribute to its image, character and quality of life will be preserved. "Landmarks" are specifically signaled out. Without question, the existing Sudbury Community Arena is one of those landmark elements that contribute to the success of the downtown (and by extension, to that of our City) and enhance our quality of life. While it may not be possible to preserve this landmark, it would be irresponsible – and contrary to this Official Plan policy – not to preserve its continued use as a public service facility in the City's downtown core.

- 4.2.1.2, Downtown Urban Environment

"High quality urban design in the Downtown will be promoted, compatible with the existing character and scale. A special focus on public spaces is intended, utilizing such design elements as street trees, landscaping, street lighting and furnishings, public art, gateway entrances and playgrounds that are wheelchair and stroller accessible."

The Downtown is a unique area of the City, rife with opportunities to encounter public art and high quality urban design. A new public facility – especially one that will cost taxpayers up to \$100 million based on estimates provided by PWC – should incorporate a high quality design that compliments surrounding uses. This can't be achieved in an industrial area – and indeed, our Plan does not contemplate the need for high quality urban design for public facilities in an industrial area. But high quality urban design could be achieved in the Downtown. Taxpayers should settle for nothing less.

- 11.0, Transportation

“Enhancing the public transportation system and encouraging increased transit use are important objectives, particularly within the context of improving air quality and contributing to Kyoto targets.

Sidewalks, bike lanes, bike paths and walking trails need to be fully integrated components of the overall transportation system, providing safe access for pedestrians and cyclists supported by good urban design principles. Opportunities to engage in recreational and leisure activities are also tied to the transportation network.”

Shifting the arena out of the downtown core, which is the best-served area of the City with regards to transit and active transportation, and moving this important public facility to an industrial area on the fringe of the urban area that is accessible primarily by personal motor vehicles will not help enhance our transit system or our active transportation systems.

- 11.1, Transportation Objectives

It is the objective of the transportation network policies to:

e. promote all travel modes, including public transit, walking and cycling;

f. provide affordable, convenient and reliable public transit service that enhances mobility and access;

g. consider the needs of the physically challenged in the planning and design of all aspects of the transportation network; and,

h. support programs that aim to reduce the environmental impacts of certain modes of transportation.

The application to permit an arena in an industrial area on the urban fringe will not assist the City with achieving transit-oriented and active transportation objectives of the Official Plan's Transportation policies. The application does not support all modes of travel; requires the inefficient and costly expansion of transit services; does not enhance mobility or access; and, does not consider the needs of physically-challenged people (particularly those who rely on motor-assist devices, given the industrial location and lack of walking options for access).

Further, the link between “Kyoto targets” and “environmental impacts” indicates a concern about how the City's transportation systems – particularly those that rely on fossil-fueled motorized vehicles – are impacting the global climate. As the City moves forward into the 21st Century, it is incumbent on decision-makers to consider the climate change impacts of their decisions. While the City currently lacks a comprehensive plan to reduce emissions, what is clear is that decision makers need to start thinking about how their decisions can help – or hinder – greenhouse gas emissions reduction.

These policies in the City's Official plan urge decision-makers to do just that, when considering development options and alternatives. This application in particular, which seeks to relocate an important, much-visited public facility out of the City's walkable, bikeable downtown core and move it to a location that is largely car-dependent will certainly work against reducing ghg emissions.

The application is not consistent with this section of the Official Plan.

- 11.3, Public Transportation

“Although the automobile will remain the primary mode of personal transportation for the foreseeable future, public transportation will play an increasingly important role for the municipality. Increased public transit use will help the City improve air quality and achieve Kyoto targets, as well as alleviate traffic congestion on Arterial Roads.

The provision of public transit is also closely aligned with other municipal initiatives. A new emphasis on residential intensification that encourages higher densities within existing built-up urban areas will in turn support the expansion of transit services and increased ridership.”

The City’s Transportation policy objectives are further articulated in this section, and a direct connection is made between the delivery of expanded transit services and a reduction in greenhouse gas emissions (“Kyoto targets”). Section 11.9 of the Official Plans speaks a little more to the importance of emissions reductions.

Further, this policy indicates that the provision of transit is aligned with other plan objectives, including residential intensification. It should be noted again that a downtown arena is specifically identified in Section 4.2.1.1 of the Official Plan as being a part of a strategy to promote residential development in the City’s core. Moving the arena to the Kingsway site will not assist with that strategy, and will therefore not help enhance the provision of cost-effective public transit services that increase ridership.

But maintaining an arena in the downtown core – an area already well-served by transit – can certainly help achieve this outcome, especially when considered as a part of a holistic approach to attract and retain knowledge-based jobs to the community through the provision of public amenities and a built environment that meets the needs and wants of knowledge-economy workers. An efficient and effective public transit system is a part of that strategy that promotes healthy living and economic prosperity.

- 11.3.2, Land Use Policies To Support Transit Needs

“The provision of public transit must be supported by compatible land uses policies and sound urban design principles in order to promote transit use as a viable option for residents. Transit-supportive policies form linkages with other City initiatives, including the need for increased residential intensification, ongoing efforts at downtown revitalization, and objectives established by the EarthCare Sudbury Local Action Plan.

1. Urban design and community development that facilitate the provision of public transit will be promoted.”

Here again, the Plan links transit policy to residential intensification and downtown revitalization. The application which will see the existing arena relocate to an industrial area on the urban fringe of the City is contrary to downtown revitalization and promoting residential intensification. It is also contrary to policies of the Official Plan, like this one, which seek to enhance our public transit system.

- 11.7, Active Transportation: Pedestrian and Bicycle Network

"Protecting and expanding the existing pedestrian and bicycle network in the City is essential to creating quality of place. Trails promote healthy lifestyles and provide an alternative transportation network."

This application will not assist with enhancing the City's pedestrian and bike network, as it will shift a well-used public facility out of the downtown core (an area well-served by active transportation facilities) and into a car-dependent location on the City's urban fringe.

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

There is inadequate pedestrian access for this development proposal. Industrial areas throughout the City have only limited pedestrian access – and the same standards can be expected on this site, given the industrial nature. The application for zoning amendment does not propose to create any new standards.

Industrial area access standards for pedestrian are inappropriate for a public service facility that is expected to service several hundred thousand visitors annually.

This application is not in keeping with this policy.

- 12.2.1, Provision of Sewer and Water Services

"The City will ensure that the sewer and water systems are provided in a manner that: is financially sound and complies with all regulatory requirements;"

This application will lead to the unnecessary expansion of public sewer and water infrastructure. If the arena were to stay in the downtown, the costly expansion of sewer and water services would be avoided.

- 12.4.2 , Energy Efficiency Programs

"5. This Plan supports district energy plants as an efficient method of supplying heating, cooling and electricity to buildings. The environmental benefits of co-generation plants are recognized for their contribution to cleaner energy sources and reduced greenhouse gas emissions.

6. Geothermal projects based on the small district energy system model will be facilitated by this Plan to meet the heating and cooling needs of new clusters of environmental businesses."

This application, which will only be realized through the provision of public funds, does not seek to use district or geothermal energy – an egregious oversight for what is ultimately a major investment of taxpayer money. Further, by taking the arena out of the downtown, the downtown's district energy system will be diminished.

Alternatively, a new downtown arena could enhanced the cost-effectiveness of the downtown district energy system.

- 14.5, Design Features, Views and Corridors

"Those aspects of the Downtown that contribute to the image, character and quality of life in the City will be identified and preserved. Viewpoints to landmark features should be preserved as a means of guiding movement through the core and enhancing the visual appeal of the Downtown.

New landmark features should be developed and integrated into the Downtown landscape, including the completion of the Farmers' Market."

This policy, too, calls for the preservation of Downtown elements that contribute to character and quality of life. It calls for the preservation of views to landmark features. And it calls for the development of new landmark features that can be integrated into the Downtown landscape. Although not specifically identified, clearly a new arena would be one of those landmark features.

Note that there are no comparable Official Plan policies that call for new landmark features in a General Industrial area.

- 14.6, Urban Design Programs

"Programs to beautify the Downtown are required to improve the quality of the built form and support its role as a centre of retail, arts & culture, government and business services. Such initiatives will contribute to the viability of Downtown residential development."

This policy, too, acknowledges the central role that the Downtown plays as a hub for retail, arts and culture, business. It also acknowledges the importance of facilitating residential development. A downtown arena is a key public facility identified in Section 4.2.1.1 of the Plan as part of a strategy to promote residential development.

- Part VI: Healthy People, Healthy Places

"Healthy Community determinants developed as part of an extensive public input process form the underlying foundation of the Official Plan. Although these principles inform all aspects of this Plan, they are presented here by major theme. Adequate access to Housing is a core need and is addressed in a separate chapter. To help us achieve our Healthy Community objectives, our essential approach to Economic Development is also presented as a series of objectives, policies and programs. Although not normally included as part of an Official Plan, these chapters are intended to provide policy direction for Council."

This area of the Official Plan identifies the importance of Healthy Community objectives to achieving economic development outcomes, tying healthy and sustainable living with building a prosperous, knowledge-based economy. A downtown arena facility, as identified in various policies found in Section 4.2 of the Official Plan, will contribute to the circumstances needed for both making our City a healthier place for residents, and a more prosperous location for business.

As such, the Plan indicates that the approach outlined here for economic development should be one pursued by Council.

- 16.2.2, Accessible Recreation Programs and Facilities

"Provide leisure and recreation facilities and programs that are accessible to all citizens. The needs of persons with disabilities shall be considered in the design and construction of public facilities including buildings and outdoor activity centres."

When looking for locations for landmark public facilities that are intended to serve the needs of all residents, consideration should be given to equity and ease of access. As noted elsewhere in the Plan, Greater Sudbury's downtown is a unique district, not only because it acts as a hub for retail, business, government services, arts, culture and entertainment uses, but also because of the built environment and the ease of access to and within the downtown for those citizens in our community that do not own or have access to motorized vehicles.

The downtown is a transit hub. It is located in an area that is within walking distance for tens of thousands of community residents. Active transportation routes, both existing and planned, lead to the downtown and connect it to other parts of the City.

Although the Kingsway projects are intended to be accessed by transit and active transportation routes, due to the suburban industrial location of the lands, only extremely limited access by non-motorized vehicles is likely to occur. This is not equitable.

Removing an important public facility from the City's downtown in favour of a location in an industrial area on the urban fringe will lead to a loss of equity and access for people who do not and cannot rely on personal motor vehicles for personal transportation.

- 16.2.3, A Prosperous Community With Employment Opportunities

"In addition to the more detailed discussion of Economic Development contained in Chapter 17.0, the following policies will apply:

1. Have regard for the City's economic development strategic plan in assessing development applications."

As noted above, the City's Economic Development Plan, "From the Ground Up – gs2015" acknowledges the downtown as the location for a new arena/events centre. The plan is silent with regards to locating this important public facility in an industrial area.

This policy suggests that Council should have regard to our economic development strategy when making decisions related to development applications. This specific development application is not in keeping with Section 16.2.3 1) of the Official Plan.

"2. Recognize the importance of "quality of place" in attracting new residents and investment to our community. Related to this, the image of a City is often associated with its Downtown and main streets. On this basis, there is a need to promote a high standard of urban design in the City."

This policy again reminds Council that when considering development applications, strategies that promote residential development, promote quality of place and promote the image of the City are important considerations. The Downtown is again specifically highlighted as being linked to the public's perception of the City. The downtown arena is a landmark public service facility that enhances the downtown's physical environment and enhances the public's perception of a successful downtown.

"3. Recognize that arts, culture, heritage and libraries are integral to healthy communities, and that the support, preservation and promotion of these are fundamental in attracting and retaining skilled, entrepreneurial individuals to the community. In addition, public libraries play a vital role in

forming a literate society and fostering lifelong learning, are community-gathering places where people interact and share ideas, and most importantly, offer an array of services to all people breaking down barriers that are fundamental to building a strong and healthy community.”

This policy links the provision of arts, culture and entertainment facilities to attracting and retaining knowledge-economy individuals and entrepreneurs. The downtown is identified in the Official Plan as the hub for arts and culture, and acts as Greater Sudbury’s entertainment district.

“4. Where compatible, encourage the location of wealth-creating businesses in close proximity to existing communities.”

While not specifically a business, the Sudbury Community Arena is the kind of public facility that is identified in the Official Plan as acting as a catalyst for community prosperity. Local businesses in the downtown core have clustered near the existing arena so as to generate economic activity as a result of the numerous patrons that are attracted to the arena - and the downtown – annually. It is a community wealth-creator.

If the City were to locate the arena in an industrial area on the fringe of the built-up part of the City, the City would lose existing synergies and miss out on additional opportunities to create wealth and prosperity. Although the so-called “Kingsway Entertainment District” concept envisions the creation of a cluster of entertainment uses in the vicinity of this application, it should be noted again that this concept has no legal or policy standing, and the review of this specific application in the context of an entertainment cluster would be inappropriate.

- 16.2.12, Community Vision and Leadership

“Decisions and actions taken by Council and City staff, including public investments and service delivery, should be guided by the policies contained within the Official Plan and on the principles of a Healthy Community.”

The City has never invested in itself in the way that it is about to do. The PWC reports, which recommended the City first pursue a new arena/event centre, and then recommended a downtown location as a priority, estimate that a public investment of up to \$100 in capital funding may be needed to construct this new amenity. Further operating losses (another form of public investment) of up to \$800,000 annually can be expected.

In short, a new arena/events centre is a public facility that is going to require the most massive investment that the City has ever made in itself.

This policy simply reminds Council that decisions related to public investments should be guided by the Official Plan. That appears to be an important reminder, given that the June 27, 2017 decision of Council to select the Kingsway industrial area as the site of the new arena/events centre did not consider the strong direction of the Official Plan, Downtown Master Plan, and Economic Development Plan – all of which clearly point to a downtown public arena.

Council and staff should pay particular attention to Section 16.2.12, Community Vision and Leadership.

- 17.1, Economic Development, Objectives

“a. enhance the comparative advantage of the City in the global economy;”

Greater Sudbury, like many mid-sized cities, is chasing after knowledge-economy based jobs. Our Official Plan and Economic Development Plan both refer to the importance of the knowledge economy for our prosperity. Greater Sudbury is a City of Science, a City of Education and a City of Regional Health Care Services. We also have one of the strongest mining and supply sectors of any City in the world. Attracting and retaining knowledge-based workers to fill the jobs that we want to create here mean that the City has to pay particular attention to the needs and wants of those who are going to fill those jobs.

The City’s Official Plan and Economic Development Plan have been designed with both in mind. And a downtown arena is one of the elements identified as being useful for fostering the type of urban environment that knowledge-based workers are seeking.

In contrast, the Official Plan and Economic Development Plans, which have a lot to say about City-building for the 21st Century and the pursuit of knowledge-based economic development initiatives – these plans are silent with regards to how a new arena/events centre in an industrial area on our urban fringe would assist with achieving these outcomes. The Plans are silent because such an approach would clearly be contrary to achieving those outcomes.

“b. encourage further diversification of the local economy, especially in the value-added sectors that generate new wealth for the community;”

Further diversification of the economy will be realized through pursuit of knowledge economy jobs.

“c. facilitate a smooth transition into the knowledge economy;”

Retrofitting a City to better meet the needs of citizens in the 21st Century will be an expensive endeavor. The City of Greater Sudbury is already at a disadvantage in many respects, due to the sprawl which has accrued around our numerous urban centres since the 1950s. An automobile-based built form does not provide the kind of flexibility that knowledge-based workers – and indeed healthy citizens of all ages – need to prosper in the 21st Century.

With this in mind, our efforts now should be on minimizing additional sprawl-based built-forms that will require expensive and costly retrofitting in the future. Locating an important, wealth-generating landmark public facility in an industrial area on the urban fringe will not assist with facilitating a smooth transition to the knowledge economy. However, continuing to locate the arena in the City’s livable downtown core will. That approach is also in keeping with the City’s Official Plan and Economic Development Plan.

“d. ensure that a full range of infrastructure is in place to support economic development;”

There is already in existence a full range of municipal infrastructure available to service a new arena in the downtown. Municipal services will need to be extended at cost to the municipality in order to realize the creation of an arena in a currently unserved industrial area on the City’s urban fringe.

To be cost-effective, the City should be looking at opportunities to use existing infrastructure first, before considering extending infrastructure.

“e. enhance the conditions that encourage economic development by fostering a culture of entrepreneurship, encouraging lifelong learning and innovation, establishing a standard of excellence in all endeavours, nurturing human capital, and constantly improving the quality of life of the community;”

The Official Plan includes numerous policies regarding how to enhance the quality of life of community residents. Many of these policies speak to how important, wealth-generating landmark public facilities like an arena should be centrally located, accessible by transit and active transportation, consider the equity needs of residents, and act in synergy with surrounding local businesses to help create prosperity.

There are no policies in the Official Plan which identify an arena in an industrial area on the urban fringe as enhancing the quality of life of the City and its residents.

“f. continue the development of Greater Sudbury as the Centre for Northeastern Ontario.”

The City’s downtown is the primary driver of public perception related to the City’s overall image, both here in the City and in a wider regional context. The Official Plan indicates elsewhere that the downtown provides services to residents and to a larger regional area. Enhancing our downtown through the development of quality of life facilities and amenities – and specifically through the creation of a new arena/events centre – is in keeping with the continued development and identification of Greater Sudbury as the capital of Northeastern Ontario.

The development of an arena/events centre in an industrial area on the urban fringe is not recommended by the City’s Official Plan or Economic Development Plan as a means of accomplishing this outcome.

- 17.5, Development Quality of Place

“Improving quality of place is directly tied to the success of our economic engines. Council must recognize the importance of recreation, arts and culture, and cultural diversity for attracting and retaining the creative talent that will contribute to the economic prosperity of the City and its entrepreneurial spirit. Given its impact on the City’s image and appeal, the physical appearance of the urban landscape must be improved through a renewed focus on good urban design.

Recognizing that quality of life is a key component of its economic development strategy, Council will strive to protect the community’s natural environment, to improve its built form, and to enhance its social environment. The development of venues to showcase local and visiting talent, as well as our vibrant ethnic and cultural activities and organizations, is essential to improving quality of place. Special emphasis on creating a youth-friendly city is required.

1. Recognizing that quality of life is a key component of its economic development strategy, Council will strive to protect the community’s natural environment, to improve its built form, and to enhance its social environment.”

This policy again links quality of place (as expressed through a vibrant arts, culture, recreation and entertainment scene) with community prosperity. Improving the City’s built-form and enhancing

the social environment by providing a landmark public service facility that equitably services community residents will enhance the City's social environment. A downtown arena is in keeping with this initiative. This application, which proposes a public service in a car-centred industrial area on the urban fringe of the City, will not enhance the social environment, or the image and appeal of our City.

"2. The development of venues to showcase local and visiting talent, as well as our vibrant ethnic and cultural activities and organizations, is essential to improving quality of place. Special emphasis on creating a youth-friendly city is required."

As one of the primary attractions for people visiting the downtown core, the Sudbury Community Arena helps support many of the local venues that visiting and local talent rely on. These venues contribute to quality of life experiences for residents. The entire downtown is able to act in an integrated way, where arts, culture, recreation and entertainment are showcased. Promoting the downtown as a hub for these activities, along with a healthy and vibrant retail/business/government services sectors and promoting residential uses, has been a priority of our Official Plan.

Further, a "youth-friendly" city is one where personal vehicles are not required for access, and transit and active transportation options exist in abundance.

By shifting the arena out of the downtown and into an industrial area on the urban fringe, the City will have diminished the very arts/culture/entertainment hub that it has long sought to enhance. It would be contrary to the City's Official Plan.

Further, based on the information provided by the applicant, it is not clear whether the application conforms to the following Official Plan policies:

Section 8, Water Resources

This section of the Official Plan seeks to protect and enhance water quality and quantity, and identifies drinking water sources as a priority.

The lands subject to this application are located within the Ramsey Lake watershed. The Nickel District Conservation Authority's Source Water Protection Plan identifies a threat to water quality for the Ramsey Lake drinking water source from the application of road salt.

The application proposes massive new surface parking facilities to accommodate the needs of more than 5,000 expected patrons. These new parking facilities will likely be subject to the application of road salt.

The Official Plan identifies that sensitive surface water features will be protected from development through restrictions if necessary. The Plan also sets out a watershed-based approach to planning.

Presently, the City is undertaking a subwatershed study for Ramsey Lake. The findings of this study could help guide this development application, however this study has not yet been completed.

The applicant has not provided any technical studies which address how salt loading in Ramsey Lake will be minimized by this application. As such, the application is premature and should not proceed until the subwatershed study is completed and appropriate technical studies that address water quality maintenance and enhancement have been produced.

Section 2 of the Planning Act - Provincial Interests

Section 2 of the Planning Act states, "*The Minister, the council of a municipality, a local board, a planning board and the Municipal Board, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,*" and then lists a number of matters of provincial interests for decision makers to have regard to.

The zoning by-law amendment appears to not have regard to the following matters of provincial interest:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (e) the supply, efficient use and conservation of energy and water;*
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (h) the orderly development of safe and healthy communities;*
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- (l) the protection of the financial and economic well-being of the Province and its municipalities;*
- (m) the co-ordination of planning activities of public bodies;*
- (n) the resolution of planning conflicts involving public and private interests;*
- (p) the appropriate location of growth and development;*
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) the promotion of built form that,*
 - (i) is well-designed,*

- (ii) encourages a sense of place, and*
- (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;*
- (s) the mitigation of greenhouse gas emissions and adaptation to a changing climate*

Northern Growth Plan

Section 3 (5) of the Planning Act states, "A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Municipal Board, in respect of the exercise of any authority that affects a planning matter,

(b) shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be."

The Province of Ontario has developed the Growth Plan for Northern Ontario, 2011, to provide a strategic framework to help guide decision-makers and investment planning decisions throughout Northern Ontario.

The City of Greater Sudbury has been identified as an *economic and service hub* by the Minister.

Plan policies indicate that,

4.1, Communities – Preamble

"...achieving a healthy, prosperous future for the North. This begins at the local level with establishing a clear vision for each community's future, and mapping out a path to achieve this vision. Official Plans, community economic plans and the participation in community planning efforts are effective tools and approaches to ensure citizens' and businesses' view are reflected in their communities' future economic and long-term sustainability."

This section of the Growth Plan outlines how community visions are to be mapped out, and identifies the importance of stakeholders in the planning process.

Here it must be noted that there was significant public input that went into the preparation of the City of Greater Sudbury's Official Plan. The 2013 Downtown Master Plan benefitted from a comprehensive and dynamic public engagement process – one that I was pleased to participate in. And "From the Ground Up – gs2025", the City's economic development plan, was also subject to a dynamic public engagement process, where citizens were able to participate in meaningful ways that ultimately informed the Plan.

In contrast, there was no public process in the lead-up to the City's selection of the Kingsway as the site for a new arena/events centre. Instead, those like me who had participated in public engagement processes with the City that led to a more fulsome articulation of policies to support the health, well-being and prosperity of the City's downtown area felt that Council's decision on June 27, 2017 was

akin to a slap in the face. In short, by selecting the Kingsway, Council broke its public promise as articulated in plan policy. That promise now should be restored, in absence of policy direction that supports Council's decision – and this application for zoning amendment.

Of further note, the Growth Plan for Northern Ontario is clearly drawing a linkage between land use planning and planning for economic development. In this context, to demonstrate consistency or a lack of conflict with the Growth Plan for Northern Ontario, other community-based planning initiatives, like our Economic Development Plan and the Downtown Master Plan, must be considered as part of any development application review.

This zoning application is not in keeping with the clear direction for the development of a public service facility in the form of a community arena, as articulated in the City's Official Plan, the Downtown Master Plan, and the City's Economic Development Plan. It is therefore also not consistent with the Growth Plan for Northern Ontario.

"4.3.2, Economic and service hubs should be designed to,

b) function as service centres that deliver important region-wide public services to the broader surrounding region;

c) function as economic hubs linking Northern Ontario with other significant economic regions in Ontario and beyond

4.3.3, Economic and service hubs shall maintain updated official plans and develop other supporting documents which include strategies for:

c) improving access to public services by local residents and by residents of surrounding communities;

e) providing for a range of transportation options;

f) enhancing community identity, vibrancy and cultural amenities"

Taken together, the economic and service hub policies of the Northern Growth Plan are largely addressed through the strong Official Plan policy direction of the Greater Sudbury's plan that identifies the downtown as an important economic and business/government services hub for municipal and regional residents, and contributes to municipal identity in the region and beyond.

Further, the City of Greater Sudbury's Official Plan includes a number of policies related to access for important public facilities.

Policies in the City's plan that seek to enhance the provision of transportation choices are also in keeping with the economic and service hub policies of the Northern Growth Plan.

However, the application for zoning amendment, which seeks to move an important public facility out of the City's downtown core and into an industrial area on the urban fringe conflicts with the economic and service hub policies of the Northern Growth Plan.

4.4, Strategic Core Areas – although not specifically identified at this time as a “strategic core area” in keeping with the Northern Growth Plan, due to the lack of a conformity exercise, the City of Greater Sudbury’s downtown is clearly intended to be a strategic core area as per the Growth Plan.

4.4.4, Strategic core areas with a revitalization strategy in place Incorporated into an official plan should be the preferred location for major capital investments in,

c) major redevelopment projects;

e) major cultural institutions and entertainment facilities.

Clearly, the Growth Plan for Northern Ontario contemplates that downtown “strategic core areas” of economic and service hubs should be the focus of public investment. The Plan specifically identifies the redevelopment of major projects (like the Sudbury Community Arena) and investment in cultural and entertainment facilities.

The lands subject to the application for zoning amendment are not located in a strategic core area, and an industrial area on the fringe of the City would not be in keeping with the definition of a strategic core area. As such, the application conflicts with the Growth Plan, which seeks to locate this kind of arena/events centre public facility in core areas of large municipalities, like Greater Sudbury’s downtown.

Identify section that references other plans

The Provincial Policy Statement

Section 3 (5) of the Planning Act states, *“A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Municipal Board, in respect of the exercise of any authority that affects a planning matter,*

(a) shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision;”

The Provincial Policy Statement, 2014 was issued under section 3 of the Planning Act, and was approved by the Lieutenant Governor in Council, Order In Council No. 107/104. It came into effect on April 30, 2014, and remains in effect. The Provincial Policy Statement, 2014 (the “PPS”) provides policy direction on matters of provincial interest and land use planning.

Section 6 of the PPS defines “public service facilities” as *“land, buildings and structure for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs, and cultural services. Public service facilities do not include infrastructure.”*

Part III of the PPS, “How to Read the Provincial Policy Statement”, states that,

"The Provincial Policy Statement is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When more than one policy is relevant, a decision-maker should consider all of the relevant policies to understand how they work together. The language of each policy, including the Implementation and Interpretation policies, will assist decision-makers in understanding how the policies are to be implemented."

and,

"There is no implied priority in the order in which the policies appear."

Part IV of the PPS, Vision for Ontario's Land Use Planning System, states, in part,

"The long-term prosperity and social well-being of Ontario depends upon planning for strong, sustainable and resilient communities for people of all ages, a clean and healthy environment, and a strong and competitive economy."

and,

"Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They also support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water and other resources. Strong, liveable and healthy communities promote and enhance human health and social well-being, are economically and environmentally sound, and are resilient to climate change."

The development of a community events centre on lands subject to the proposed zoning by-law amendment appears to be contrary to the Vision for Ontario's Land Use Planning System.

The following Policies found in Part V of the PPS are applicable to the proposed zoning by-law amendment:

1.0 Building Strong Healthy Communities

Ontario is a vast province with urban, rural, and northern communities with diversity in population, economic activities, pace of growth, service levels and physical and natural conditions. Ontario's long-term prosperity, environmental health and social well-being depend on wisely managing change and promoting efficient land use and development patterns. Efficient land use and development patterns support sustainability by promoting strong, liveable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth.

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 range and mix of residential (including second units, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- c) avoiding development and land use patterns which may cause environmental or public health and safety concerns*
- e) promoting cost-effective development patterns and standards to minimize land consumption and servicing costs;*
- g) ensuring that necessary infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities are or will be available to meet current and projected needs; and*
- h) promoting development and land use patterns that conserve biodiversity and consider the impacts of a changing climate.*

1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area. Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas. Nothing in policy 1.1.2 limits the planning for infrastructure and public service facilities beyond a 20-year time horizon.

1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.

1.1.3.4 Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety

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

1.1.3.7 Planning authorities shall establish and implement phasing policies to ensure:

- a) that specified targets for intensification and redevelopment are achieved prior to, or concurrent with, new development within designated growth areas; and b) the orderly progression of development within designated growth areas and the timely provision of the infrastructure and public service facilities required to meet current and projected needs.*

1.2 Coordination

1.2.1 A coordinated, integrated and comprehensive approach should be used when dealing with planning matters within municipalities, across lower, single and/or upper-tier municipal boundaries, and with other orders of government, agencies and boards including:

- a) managing and/or promoting growth and development;*
- b) economic development strategies;*
- c) managing natural heritage, water, agricultural, mineral, and cultural heritage and archaeological resources;*
- d) infrastructure, electricity generation facilities and transmission and distribution systems, multimodal transportation systems, public service facilities and waste management systems;*

1.2.3 Planning authorities should coordinate emergency management and other economic, environmental and social planning considerations to support efficient and resilient communities.

1.3 Employment

1.3.1 Planning authorities shall promote economic development and competitiveness by:

- a) providing for an appropriate mix and range of employment and institutional uses to meet long-term needs;*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities; and*
- d) ensuring the necessary infrastructure is provided to support current and projected needs.*

1.5.1 Healthy, active communities should be promoted by:

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

1.6 Infrastructure and Public Service Facilities

1.6.1 Infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities shall be provided in a coordinated, efficient and cost-effective manner that considers impacts from climate change while accommodating projected needs. Planning for infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities shall be coordinated and integrated with land use planning so that they are:

- a) financially viable over their life cycle, which may be demonstrated through asset management planning; and*
- b) available to meet current and projected needs.*

1.6.2 Planning authorities should promote green infrastructure to complement infrastructure.

1.6.3 Before consideration is given to developing new infrastructure and public service facilities:

- a) the use of existing infrastructure and public service facilities should be optimized; and*

b) opportunities for adaptive re-use should be considered, wherever feasible.

1.6.4 Infrastructure and public service facilities should be strategically located to support the effective and efficient delivery of emergency management services.

1.6.5 Public service facilities should be co-located in community hubs, where appropriate, to promote cost-effectiveness and facilitate service integration, access to transit and active transportation.

1.6.6 Sewage, Water and Stormwater

1.6.6.1 Planning for sewage and water services shall:

a) direct and accommodate expected growth or development in a manner that promotes the efficient use and optimization of existing:

1. municipal sewage services and municipal water services;

1.6.6.7 Planning for stormwater management shall:

a) minimize, or, where possible, prevent increases in contaminant loads;

c) not increase risks to human health and safety and property damage;

d) maximize the extent and function of vegetative and pervious surfaces;

and

e) promote stormwater management best practices, including stormwater attenuation and re-use, and low impact development.

1.6.7 Transportation Systems

1.6.7.1 Transportation systems should be provided which are safe, energy efficient, facilitate the movement of people and goods, and are appropriate to address projected needs.

1.6.7.3 As part of a multimodal transportation system, connectivity within and among transportation systems and modes should be maintained and, where possible, improved including connections which cross jurisdictional boundaries.

1.6.7.4 A land use pattern, density and mix of uses should be promoted that minimize the length and number of vehicle trips and support current and future use of transit and active transportation.

1.6.7.5 Transportation and land use considerations shall be integrated at all stages of the planning process.

1.6.11 Energy Supply

1.6.11.1 Planning authorities should provide opportunities for the development of energy supply including electricity generation facilities and transmission and distribution systems, to accommodate current and projected needs.

1.6.11.2 Planning authorities should promote renewable energy systems and alternative energy systems, where feasible, in accordance with provincial and federal requirements.

1.7 Long-Term Economic Prosperity

1.7.1 Long-term economic prosperity should be supported by:

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

- b) optimizing the long-term availability and use of land, resources, infrastructure, electricity generation facilities and transmission and distribution systems, and public service facilities;*
- c) maintaining and, where possible, enhancing the vitality and viability of downtowns and mainstreets;*
- d) encouraging a sense of place, by promoting well-designed built form and cultural planning, and by conserving features that help define character, including built heritage resources and cultural heritage landscapes;*
- f) providing for an efficient, cost-effective, reliable multimodal transportation system that is integrated with adjacent systems and those of other jurisdictions, and is appropriate to address projected needs to support the movement of goods and people;*
- g) providing opportunities for sustainable tourism development;*
- i) promoting energy conservation and providing opportunities for development of renewable energy systems and alternative energy systems, including district energy;*
- j) minimizing negative impacts from a changing climate and considering the ecological benefits provided by nature*

1.8 Energy Conservation, Air Quality and Climate Change

1.8.1 Planning authorities shall support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation through land use and development patterns which:

- a) promote compact form and a structure of nodes and corridors;*
- b) promote the use of active transportation and transit in and between residential, employment (including commercial and industrial) and institutional uses and other areas;*
- c) focus major employment, commercial and other travel-intensive land uses on sites which are well served by transit where this exists or is to be developed, or designing these to facilitate the establishment of transit in the future;*
- f) promote design and orientation which:*
 - 1. maximizes energy efficiency and conservation, and considers the mitigating effects of vegetation; and*
 - 2. maximizes opportunities for the use of renewable energy systems and alternative energy systems;*

2.2 Water

2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by:

- a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development;*
- b) minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts;*
- e) implementing necessary restrictions on development and site alteration to:*
 - 1. protect all municipal drinking water supplies and designated vulnerable areas; and*
 - h) ensuring stormwater management practices minimize stormwater volumes and contaminant loads, and maintain or increase the extent of vegetative and pervious surfaces.*

2.2.2 Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored. Mitigative measures and/or alternative development approaches may be required in order to protect, improve or restore sensitive surface water features,

sensitive ground water features, and their hydrologic functions.

4.7 The official plan is the most important vehicle for implementation of this Provincial Policy Statement. Comprehensive, integrated and long-term planning is best achieved through official plans. Official plans shall identify provincial interests and set out appropriate land use designations and policies. To determine the significance of some natural heritage features and other resources, evaluation may be required. Official plans should also coordinate cross-boundary matters to complement the actions of other planning authorities and promote mutually beneficial solutions. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and direct development to suitable areas.

In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with this Provincial Policy Statement. The policies of this Provincial Policy Statement continue to apply after adoption and approval of an official plan.

Conclusion

The application filed by 1916596 Ontario Ltd. to amend the City's zoning by-law to permit a "recreation and community centre" on the subject lands does not have regard to Section 2 of the Planning Act, is not consistent with the Provincial Policy Statement, 2014, is not consistent and does conflict with the Growth Plan for Northern Ontario, does not conform to the City of Greater Sudbury's Official Plan, is not in keeping with the development direction of the City as expressed through public consultation that informed and led to the acceptance by the City of the Downtown Master Plan and "From the Ground Up", the City's economic development plan, and it does not represent good planning.

Conformity with the City's Official Plan, consistency with the PPS and Northern Growth Plan, and regard to Section 2 of the Planning Act cannot be demonstrated through planning rationale that suggests institutional uses are permitted throughout the municipality, and that therefore this specific institutional use is appropriate for this specific location, as this approach is contrary to Official Plan policy Section 20.5.2 which pertains to Rezoning Applications, and which indicates, "*It shall be the policy of Council to ensure that the Zoning By-law and amendments thereto conform with this Plan. To this end, it is the intent of Council to evaluate each rezoning application according to all applicable policies – simple conformity with land use designation does not automatically guarantee a rezoning to the proposed use.*"

Further, such an approach ignores the overwhelming policy direction found in the City's Official Plan that would direct this kind of public service facility to the City's Downtown. Similarly, the approach ignores the policies of the Northern Growth Plan for redevelopment initiatives and the development of entertainment facilities. Ultimately, that approach is not consistent with the Provincial Policy Statement, 2014 and does not have regard to Section 2 of the Planning Act.

For all of the above reasons, Council should refuse the proposed zoning amendment.

Please provide me with Notice of Council's decision with regards to this matter.

Steve May
Resident

[REDACTED]

From: Maria
To: <clerks@greatersudbury.ca>
CC: Al Sizer <Al.Sizer@greatersudbury.ca>
Date: 3/16/2018 8:25 AM
Subject: I SUPPORT LOCATING THE ARENA & THE CASINO AT TNS!

To: clerks@greatersudbury.ca


Subject: I SUPPORT LOCATING ARENA & CASINO AT TNS

To the True North Strong (Kingsway Entertainment District) Planning Committee.

I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

I am looking forward to celebrating the establishment of this much needed sports and entertainment district in our community in the very near future!

Maria Bozzo



From: Ron Hamilton
To: <clerks@greatersudbury.ca>
CC:
Date: 3/16/2018 12:36 PM
Subject: As of reading northern life on Thursday March 15 I was appauld what is going on .

What is happening about the Kingsway arena project. Didn't the councillors and the mayor not passed this project we can not let this council go back on their words. Let's get the rezoning pass don't let it take 30 years or more to get a new arena I know there is some business people in Sudbury that don't want it. We had a chance to built when one councillor want to built it but the mayor and the councillors said no .we all pay taxes in Sudbury so get over it and get it done before we lose are Sudbury Wolves clean up down town we want jobs for the younger people to have Ray Hamilton S Hamilton

Sent from my iPad

To the True North Strong (Kingsway Entertainment District) Planning Committee. I very much support Greater Sudbury and Gateway Casino's application for rezoning the lands located on the north side of the Kingsway, northwest of Levesque Street in Sudbury to permit a recreation and community centre in the form of a public arena on approx. 11.96 hectares of land and a place of amusement in the form of a casino on approximately 6.96 hectares of land.

yours truly,
GCS taxpayer
Colette Proulx

