

Citizens for an Accountable Mega-Hospital Planning Process (CAMPP)

www.windsormegahospital.ca

After reviewing the material presented at the public information evening on September 7, 2016, Citizens for an Accountable Mega-hospital Planning Process would like to register its opposition to the proposed Official Plan amendment and zoning by-laws.

The proposed Official Plan amendment and changes to the zoning by-laws to accommodate the construction of a hospital are neither in the best interests of the residents of Windsor, nor supported by provincial policies and strategies, including Provincial Planning Policy and Ontario's Climate Change Action Plan.

- Windsor Regional Hospital is applying for this change in order to accommodate a hospital. This is not an organic expansion based on credible population growth projections.
- The plan is based on outdated population projections that are not supported by more recent Ministry of Finance and the Erie St Clair LHIN statistical analyses.
- It is a proposal that will promote urban sprawl and leave urban decay in its wake.

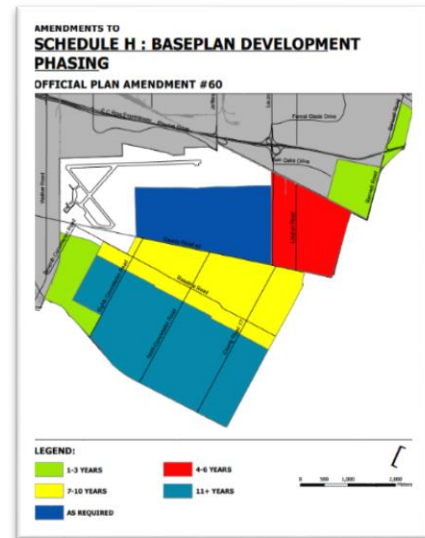
Summary of Key Points

1. The proposed development, if approved, will accelerate outmigration from Windsor's core.
2. Population projections by the Ministry of Finance and the Erie St. Clair LHIN published in 2016 in fact contradict the long term population projections used in the Lauzon Parkway EA.
3. The Sandwich South land is expected to accommodate 14,000 residents, representing 47% of Essex County's predicted long term population growth, contradicting the language and goals of Ontario's Provincial Planning Policy.
4. Our community's senior population is increasing significantly in proportion to the total population and we need compact community design to enable more seniors to age in place.
5. Smart Growth strategies and the anticipated tailing off of Canada's housing boom favour medium and high density, rather than more low density housing.
6. The hollowing out of Windsor's core needs to be brought under control rather than planning even more outward expansion.
7. Windsor's 2010 Brownfield Redevelopment Strategy identifies 559 acres of brownfield land and justifies the economic advantages of redeveloping such land, rather than using greenfield land to accommodate anticipated future needs.
8. An economic impact analysis is needed to quantify the effect of the proposed transfer of 4,000 direct and indirect jobs out of Windsor's core.
9. The proposal builds on mid- and late twentieth century development practices, instead of aligning itself with Canada's federal and provincial climate change goals and land use planning strategies.
10. The stated goal of 3,096 surface parking spaces is a product of outdated thinking that ignores environmental stewardship, rather than developing in a manner that facilitates effective strategies to reduce the overall need for parking.

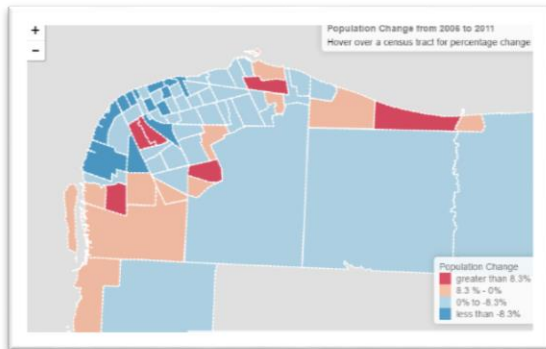
1. Non-Contiguous Development

The proposed development, if approved, will accelerate outmigration from Windsor’s core.

The [2007 Draft Official Plan amendment](#) sequences the development of the Sandwich South land differently than currently proposed. The red area, originally proposed as a residential neighbourhood in the diagram to the right, was to be developed *before* the yellow area.



The result of this change in sequencing, if approved, would be to “leapfrog” over agricultural land *in order to* accommodate hospital development, rather than developing the land organically over time to meet realistic population growth needs.



This [interactive map](#) illustrates very effectively how and where the existing hole in Windsor’s urban doughnut expanded between 2006 and 2011.

2. Population Growth Expectations

Population projections by the Ministry of Finance and the Erie St. Clair LHIN published in 2016 in fact contradict the long term population projections used in the Lauzon Parkway EA.

According to the [2014 Lauzon Parkway Improvements Class EA Study](#) (page 110):

Municipality	2011	2016	2021	2031	Growth 2011-31	Annual Growth Rate
City of Windsor	219,698 ²	226,631	235,521	250,206	30,508	0.65%
Windsor-Essex Region	402,588	418,521	439,011	473,966	71,378	0.82%

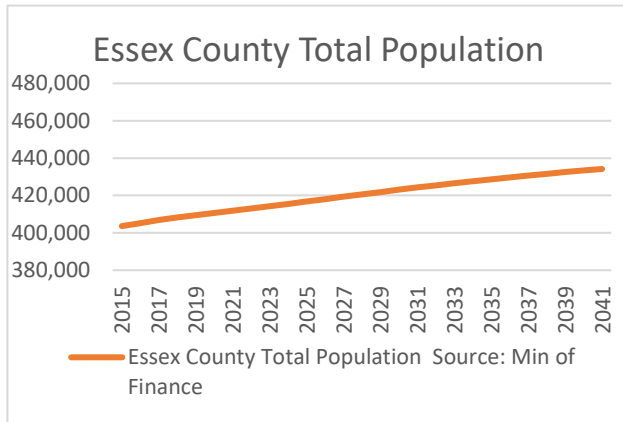
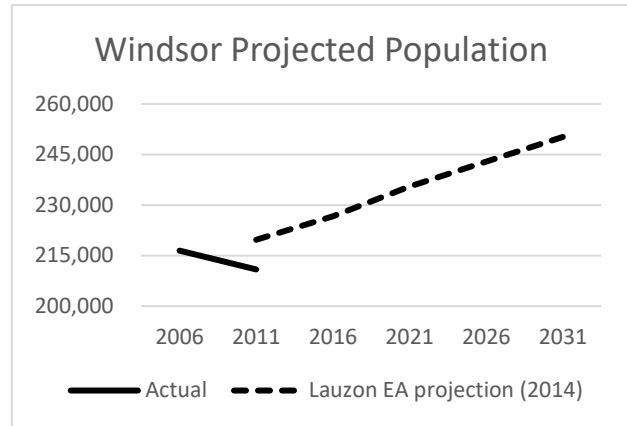
² Population based on projections available at the onset of this study, in March 2011, and used for the preparation of the Traffic Demand Model to identify future transportation needs. The actual 2011 population was 210,891. The difference between the projected and actual population may impact the timing of when the recommended changes should be implemented but not the overall need for the project.

The [2011 census](#) showed Windsor’s actual population was 210,891, representing a **2.6% decline** from 216,473 residents in 2006. The 2011 data point is thus off by 8,807 residents, an error of 4% ([Essex County as a whole](#) also shrank in this period, with declines registered in Tecumseh and Amherstburg).

An admission of the discrepancy is buried in the footnote on the previous page, ascribing it to the timing of the preparation of the model in 2011.

Analyses dated 2016 show that population growth is stagnant. Importantly, they cast considerable doubt on the older, more optimistic City of Windsor predictions.

The graph to the right illustrates the gap between census data and [Lauzon Parkway EA](#) population growth expectations through 2031.

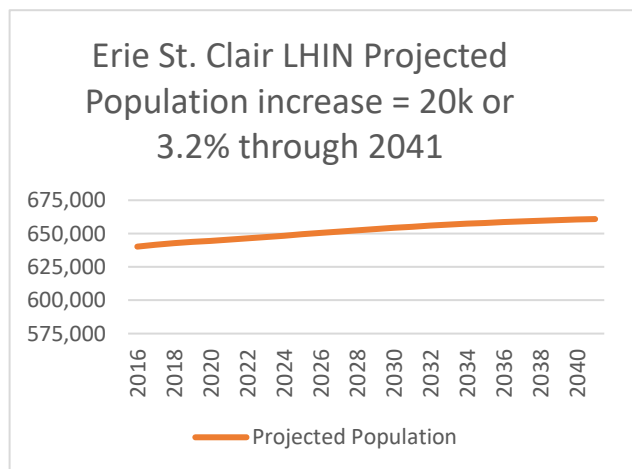


The [Ministry of Finance](#) provides year on year statistical population projections that extend 10 years further than the Windsor data.

These predict an increase of **just 30,000 residents through 2041 (7.5%) for the entire region of Essex County.**

Similarly, the [Erie St. Clair LHIN](#)’s own data predicts a total increase of **just 20,000 residents through 2041 (3.2%) for the entire region** under its jurisdiction:

The 2016 census results are not expected to be released before 2017.



3. Provincial Planning Policy

The Sandwich South land is expected to accommodate 14,000 residents, representing 47% of Essex County's predicted long term population growth, contradicting the language and goals of Ontario's Provincial Planning Policy.

The [2014 Provincial Planning Policy](#) (PPS) states:

A planning authority may identify a *settlement area* or allow the expansion of a *settlement area* boundary only at the time of a *comprehensive review* and only where it has been demonstrated that:

- a) sufficient opportunities for growth are not available through *intensification, redevelopment* and *designated growth areas* to accommodate the projected needs over the identified planning horizon;
- b) the *infrastructure* and *public service facilities* which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;

There is no evidence that future needs have been exhausted through intensification, redevelopment or development of Windsor's six designated growth areas. On the contrary, the [Lauzon Parkway EA](#) notes:

The *Windsor Annexed Lands Master Planning Study* (2006) identified the need for the additional land requirements and proposed population and employment allocation in the Windsor Annexed Area. The population increase in the Windsor Annexed Area is expected to increase approximately to 14,000 persons and employment to approximately 10,000 between 2011 and 2031.

With regards to the hospital project specifically, the [Pre-Capital Submission](#), as early as 2009, predetermined a 50-60 acre greenfield site:

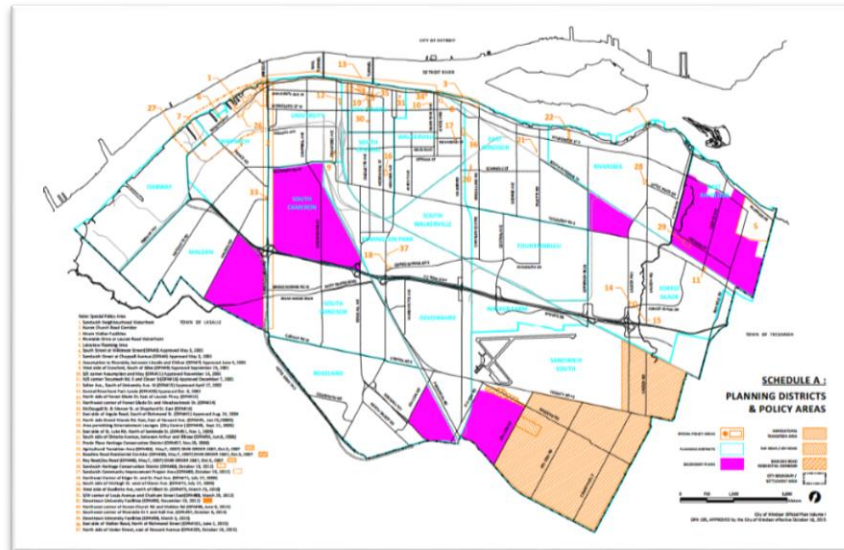
The current facility will be replaced on a new Greenfield site.

Option 3 proposes the replacement of the existing hospital with a new facility constructed on a new site. It is recommended that a site of 50 to 60 acres be provided, allowing adequate space for future expansion and regeneration of the facility, and providing space for on-grade parking without resorting to an expensive parking garage.

There is no indication that a brownfield redevelopment opportunity, potentially on a smaller urban site, was ever considered as an alternative to developing an agricultural area, a key PPS requirement.

As regards intensification opportunities, it should be noted that these were offered by the top-scoring shortlisted site and one other highly ranked site under the RFP process.

Both are located within [Windsor's existing development districts](#) (the magenta areas):



Finally, the PPS refers to a need to demonstrate infrastructure and public service facilities. There is currently no hydro service to this area as required under the hospital RFP. While the [Lauzon Parkway Environmental Assessment](#) includes County Road 42, the needs of Concession 9 have not been investigated. The public information display boards provided no information on infrastructure. Ms. Walkey, the Stantec representative, confirmed it was a detail that was not being presented at the open house.

This means there is little or no public insight into the adequacy of the infrastructure and public service facilities, how much these will cost, or how they are expected to be paid for.

4. Aging in Place

Our community's senior population is increasing significantly in proportion to the total population and we need compact community design to enable more seniors to age in place.

The regional [Population and Housing Projections 2006-2031](#) report (page 4) identifies seniors, the most significant users of hospital services, as the region's largest growth demographic:

Seniors aged 65 years and older will grow from 13% of the population in 2006 to 19% by 2031 exhibiting both the largest percentage and absolute change in age groups. This latter group will grow by 60% between 2006 and 2026 and will represent close to half of all the population growth in the future.

On page 10 we read that:

Over the study period the demand for single-detached homes is expected to make up a declining share of the total falling from a high of 70% between 2006 and 2011 to 64% between 2026 and 2031. Medium and higher density forms (row housing and apartments) are expected to play an increasing role in housing demand rising from 20% between 2006 and 2011 to 29% between 2026 and 2031 reflecting the aging of the population, the growing appeal of condominiums as both entry level housing and as housing for more mature adults looking to downsize, and, a policy of more compact communities.

[Ontario's Action Plan for Seniors](#) reinforces the need for accessible support infrastructure to meet the demands of an aging community:

Better Access to Government Programs

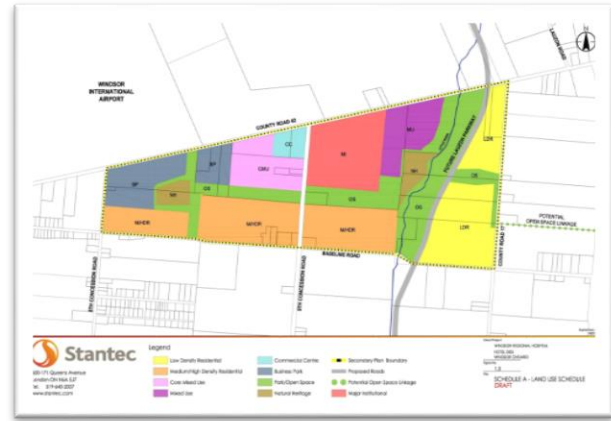
If we are to create truly senior-friendly communities, we must not only put programs and services in place that support and help seniors, but also ensure those programs and services are easily understood and accessed.

This points to the need for higher density development within established neighbourhoods, rather than continued urban sprawl, which is socially isolating for seniors and makes it more expensive and more difficult, especially those who are mobility impaired, to access healthcare services that are outside their neighbourhood.

5. **Smart Growth**

Smart Growth strategies and the anticipated tailing off of Canada’s housing boom favour medium and high density, rather than more low density housing.

The yellow area in Stantec’s chart from the Open House shows a sizable portion of the area under consideration devoted to low density residential housing:



It is true that there is now less room for expansion to Riverside’s east end (the largest of Windsor’s 6 magenta secondary plans shown on the previous page), which has seen an extended multi-year development streak.

Canadian market in a cooling phase
 The statistics for August has provided further evidence that Canada’s housing market has entered a cooling phase, with one of its two principal engines—Vancouver—now clearly in correction mode. While there remains substantial uncertainty about the ultimate effects of the new foreign buyer tax in Metro Vancouver beyond the initial market reaction, we believe that activity in Vancouver is likely to remain well below the all-time peak reached earlier this year, and that continued strength in Toronto will only partly offset the impact at the national level. We expect that this cooling will translate into a decline of 3.7% in Canadian home resales in 2017, although we still project an increase of 5.1% in 2016 because of strong gains recorded during the first half of this year.

Yet, there is [increasing evidence that Canada’s housing boom](#) is tapering off, which means future housing demand, especially in light of our regional stagnant population growth as described above, should largely be met through the supply of existing housing stock, rather than new construction.

Recent developments in Vancouver—and other BC markets—marked a turning point for Canada’s housing market, which has entered a cooling phase. Our outlook calls for further weakness in Vancouver in the near term weighing on overall activity in Canada despite sustained strength in Toronto and other southern Ontario markets. We expect prices to decelerate significantly over the coming months in BC.

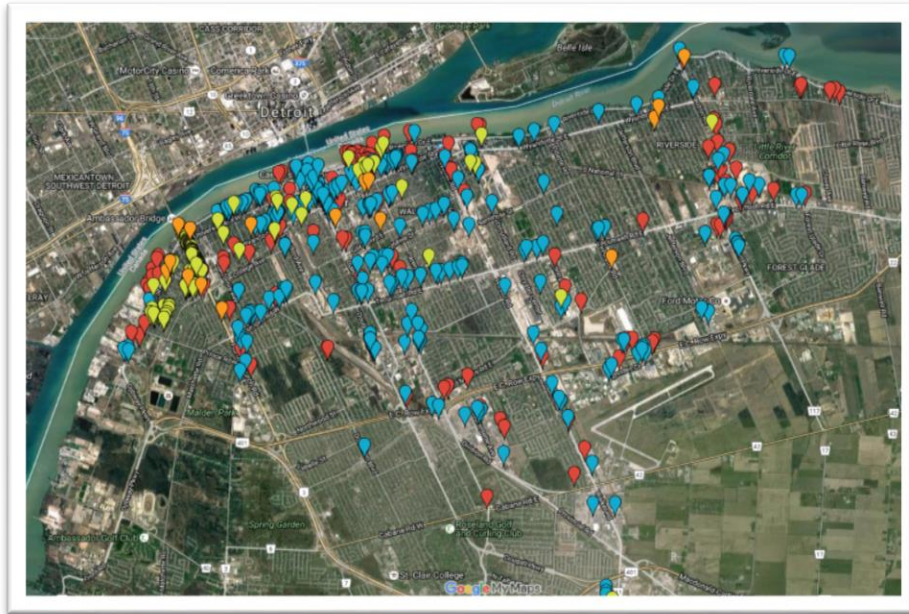
- We believe in:**
- **complete communities**: designing urban villages, where everything you need to live well is available locally, nested within strong municipalities and regions.
 - **smart transportation**: ways to drive less and enjoy getting around.
 - **protecting resources**: protecting farmland, watersheds, natural areas, and other resources that are essential for a sustainable future.
 - **people-centred planning**: helping people shape development to meet their needs.

In addition, the [Ontario Smart Growth Network](#), an initiative of the Ministry of Health and Long-Term Care, promotes complete, compact communities. Its goals are contrary to the anticipated effects of developing the Sandwich South land.

6. Vacant Windsor

The hollowing out of Windsor's core needs to be brought under control, rather than planning even more outward expansion.

[Vacant Windsor](#) is a citizens group that formed in 2015 to draw attention to, and quantify, the empty and abandoned properties in Windsor.



What the approximately 700 crowd-sourced entries reveal is eye-opening. It proves that Windsor has a serious problem with underutilized land throughout its established neighbourhoods.

While most of the properties are much smaller than needed for a new hospital, they serve as a warning that further urban sprawl will only exacerbate Windsor's problems. New homes on the outskirts encourage outmigration, diluting resources available to maintain all of the city's wards. There is a tendency to "follow the money" when planning infrastructure upgrades and municipal amenities, putting even more pressure on already hollowing-out neighbourhoods.

The project also identifies several large industrial sites, or potential consolidated sites, with the capacity to accommodate a new hospital closer to Windsor's core.

There is plenty of opportunity for intensification and brownfield redevelopment within Windsor's urban core; what is lacking to date is the insight and leadership to ensure it takes precedence over greenfield construction.

7. Brownfield Redevelopment Strategy

Windsor's [2010 Brownfield Redevelopment Strategy](#) identifies 559 acres of brownfield land and justifies the economic advantages of redeveloping such land, rather than using greenfield land to accommodate anticipated future needs.

An inventory of 137 potential redevelopment properties was identified by the City of Windsor and these properties are shown on the map in Appendix A of the Priority Redevelopment Sites and Areas Report (September 2009). All 137 properties in this Redevelopment Opportunities Inventory (ROI) are located within the urban area. Most of these properties include non-operating and some operating heavy industrial and commercial uses. There are also a number of institutional uses and vacant lands. Many of the properties including those with buildings, are underutilized. In total, the 137 properties comprise approximately 226 ha (559 acres) with properties ranging in size from 0.017 ha (0.043 acres) to 64.4 ha (159.1 acres). The average property size is 1.65 ha (4.08 acres) with 11 of the 137 properties being over 4 ha (10 acres) in size.

The properties are located from the west end to the east end of the urban area. Most (over 70% of the properties) are concentrated in one of four clusters. At the west end, there are approximately 11 properties located in the port waterfront area in Olde Sandwich Towne. A second large cluster containing approximately 32 identified sites is located in the Walker Road area. This linear cluster extends from north of Tecumseh Road to Riverside Drive. A third cluster containing approximately 33 properties is located east of the Walker Road cluster and is centered just to the east of the former Ford foundry. This cluster is located between South National Street and the rail line to the north, Drouillard Street to the west and Seminole Street to the south. Finally, a fourth cluster containing approximately 21 properties is located in the east end of the city on the east and west sides of Lauzon Road at South National Street close to the City's new arena.

8. Community Anchor

An economic impact analysis is needed to quantify the effect of the proposed transfer of 4,000 direct and indirect jobs out of Windsor's core.

Hospitals have been community anchors as long as communities have had hospitals. Institutional zoning for the proposed hospital on the Sandwich South land must be considered in conjunction with the cost to the community of the planned loss of two century-old anchors in Windsor's core.

More than 4,000 people depend on Windsor Regional Hospital for their livelihood. It is the region's second largest employer. Healthcare satellites planned for the Ouellette and Grace sites are day facilities and will both be significantly smaller than the existing structures where Met and Ouellette campuses currently stand.

An economic impact analysis quantifying the effects of the proposed move does not appear to have been performed. A study is needed to ask:

- (1) physicians whether they are likely to move their offices, and
- (2) all hospital workers and other residents who live close to the hospitals today whether they are likely to move in order to be closer to the proposed new hospital site,

in order to determine the future economic loss to Windsor's core neighbourhoods.

9. Climate Change

The proposal builds on mid- and late twentieth century development practices, instead of aligning itself with Canada's federal and provincial climate change goals and land use planning strategies.

Ontario's [Climate Change Action Plan](#) calls for prioritization of climate change mitigation, sustainable transportation management, compact, walkable urban design, and preserving Ontario's farmland and natural areas.

While the proposed Secondary Plan amendment contains features like walkability and bicycle paths, the distance from Windsor's core, as well as from all the other County municipalities, makes it unlikely that many hospital staff, patients or other visitors will use active transportation to access the hospital.

The proposal includes the preservation of some natural areas, while removing a significant amount of productive farmland from the existing inventory.

According to the Climate Change Action Plan:

Over time, fighting climate change requires a shift in how we live, work and move. The plan provides choice: it gives consumers and businesses the tools to change their behaviours and reduce their carbon footprints. It provides businesses with certainty and stability. It promotes the innovation that will propel Ontario's transition to a low-carbon economy and create good jobs for Ontarians. And it will preserve and protect our natural environment for future generations to enjoy.

10. Surface Parking

The stated goal of 3,096 surface parking spaces is a product of outdated thinking that ignores environmental stewardship, rather than developing in a manner that facilitates effective strategies to reduce the overall need for parking.

Stantec's chart from the Open House illustrates how much acreage is devoted to surface parking on the proposed 60 acre hospital site:

The [2009 Pre-Capital Submission](#) established copious parking as a primary goal. As already noted on page 5, parking structure options were not an option:

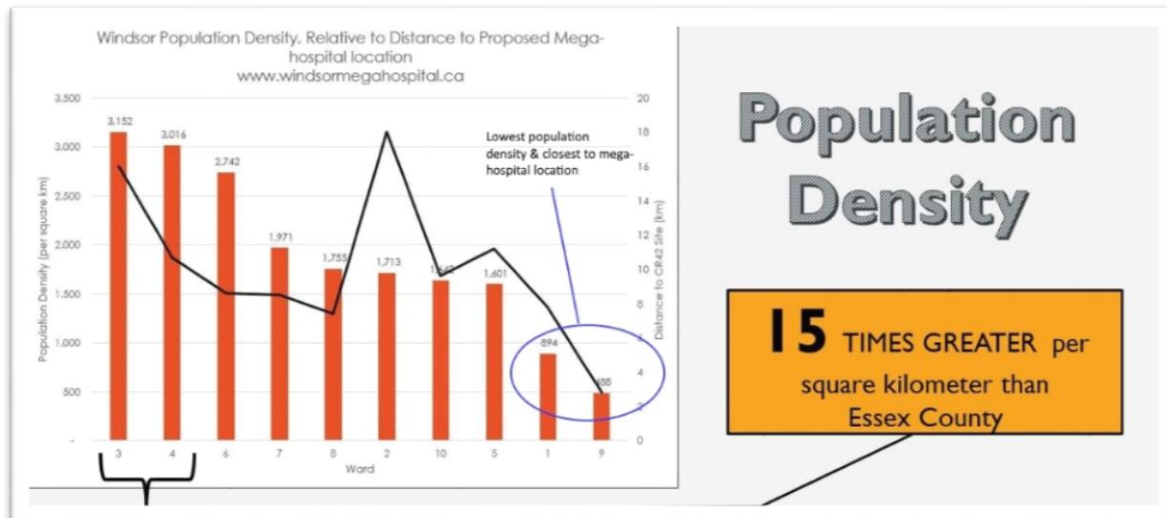
"It is recommended that a site of 50 to 60 acres be provided, allowing adequate space for future expansion and regeneration of the facility, and providing space for on-grade parking without resorting to an expensive parking garage."



The RFP awarded the greatest number of points for a site with capacity for 3,096 surface parking spaces.

5. Parking potential	Parking is generally defined by two criteria: the Municipal Zoning By-law and anticipated use. Hospital uses are often 1 space per bed. The second criterion is typical patient usage and need. A range of 1 space per 45m ² to 60m ² gross floor area is suggested to be optimal for a long term build out scenario. Surface parking will be preferred. Parking is to be calculated on the	The Site achieves a parking ratio of:	5	50
		- "10": Greater than 1 space per 45m ² (3,096 spaces)		
		- "7": Greater than 1 space per 50m ² (2,787 spaces)		
		- "5": Greater than 1 space per 60m ² (2,322 spaces)		
		- "3": Greater than 1 space per 70m ² (1,990 spaces)		
		- "1": Less than 1 space per		

The distance of the proposed hospital from Windsor's established neighbourhoods will necessitate more parking infrastructure than a location that is closer to neighbourhoods with greater population density.



The further the aggregate distance travelled by hospital users, the less likely it is that they will use alternative forms of transportation, like public transit, cycling or walking, to access the new hospital.

Ontario's Climate Change Action Plan, in the [section on municipal land use planning](#), is one of many resources recognizing that extensive parking is a barrier to developing complete, compact communities that embrace active forms of transportation.

1.4 Eliminate minimum parking requirements

Minimum parking requirements would be eliminated over the next five years for municipal zoning bylaws, especially in transit corridors and other high-density, highly walkable communities. Minimum parking requirements are a barrier to creating complete, compact and mixed-use communities. Instead, bylaws will encourage bike lanes, larger sidewalks, and enhanced tree canopies.