



Gordon H. Russell
Planning and Development Services

Collingwood General & Marine Hospital
-Confidential Planning Analysis Report-
March 24, 2017

1. Background Review:

1.1 Overview: Ontario Health Care System

The Ministry of Health and Long-Term Care (MoHLTC) provides overall direction and leadership for the public system. The Ministry is responsible for: 1) overall strategic direction and provincial priorities for the health system; 2) developing legislation, regulations, policies, and directions to support those strategic directions; 3) monitoring overall performance of Ontario's Health system; and 4) establishing levels of funding for the health care system. In summary the Ministry is responsible for providing a patient-focused, results-driven, integrated and sustainable publicly funded health care system.

The provincial *Public Hospitals Act* and its regulations set out the framework for the operation of hospitals in Ontario. There are more than two hundred (200) hospital sites in Ontario comprised of four different types of hospitals including; 1) Public Hospitals; 2) Private Hospitals; 3) Federal Hospitals; and 4) Cancer Care Ontario Hospitals. These hospitals are categorized into the following hospital types; 1) general hospitals; 2) convalescent hospitals; 3) hospitals for chronic patients; 4) psychiatric hospitals; 5) treatment hospitals for alcoholism; and 6) drug addiction and rehabilitation hospitals. The Collingwood General and Marine Hospital is a 'Public General Hospital', graded as a Group C hospital, having fewer than one hundred (100) beds.

The Ministry of Health and Long-Term Care through the Local Health System Integration Act, 2006 (LHSIA) established and oversees the mandate and powers of the Local Health Integration Network (LHIN). There are fourteen (14) Local Health Integration Networks (LHINs) in Ontario. The network was established to move health care administration from the provincial level to the local level. LHINs allocate provincial funds to health care providers (hospitals) across the region and work with each provider to plan, engage and make decisions at a local level with the optimal goal of improving our public health care system.

The Collingwood General & Marine Hospital, like all general hospitals in Ontario, are independent corporations run by their own board of directors. The boards are responsible for day-to-day operational decisions on how to allocate the public funding they receive. Hospitals are accountable to their Local Health Integration Network (LHIN) which is accountable to the provincial Ministry.

Ontario residents, upon presentation of a health care card, have their medically necessary health care services paid by the Ontario Health Insurance Plan (OHIP).

1.2 Receipt of Provincial Public Funds:

Collingwood General & Marine Hospital (CGMH) Letter, dated March 22, 2017

- CGMH receives funding from a variety of sources;
- The largest source of funding for the hospital is government funding received from the Ministry of Health and Long-Term Care (MoHLTC) through the Local Health Integration Networks (LHINs) as approved through the provincial budget;
- Government funding covers approximately 85% or +/- \$43,000,000.00 dollars of operating revenues at CGMH;
- Government funding is directly used in the provision of health programs and services inclusive of:

- Emergency Department;
- General Medical Services and Intensive Care Unit;
- General Surgical Services and the Operating Room;
- Orthopaedic Services;
- Obstetrics and Gynecology;
- Community Mental Health (CMH);
- Diagnostic Imaging;
- Laboratory;
- Ambulatory Care;
- Enablers for Programs and Services through partnerships with other local and regional health care providers; and
- Information systems utilizing new technology for staff and physicians to support patient care enabling upgrades to electronic medical records, patient order sets and medical directives, wireless networks enabling mobile x-ray, communication and mobile access to electronic medical records.

1.3 Scope:

The scope of this 'Planning Review' consists of an in-office review of all planning documents known to be available for the purpose of assessing and providing a professional planning opinion regarding a general hospital use and the selection of the preferred future site for the new Collingwood General & Marine Hospital facility, utilizing approximately 12.1 ha (+/-30 ac) of land area (the subject lands), generally to be located at the north-east corner of Raglan Street and Poplar Side Road (Cty Rd. No. 32). As requested for the purpose of confidentiality no civil servants (Provincial, County or Town) or associated consultants were contacted to assist with or confirm the following planning information or interpretation for the purpose of this planning review.

1.4 Land Use Designation and Zones:

In accordance to the Town of Collingwood's Official Plan, Schedule 'A' the subject lands are designated Industrial Park. In accordance to the Town of Collingwood's Zoning By-law No. 2010-040, as amended Schedule 'A' - Map 28, the subject lands are potentially divided into three (3) different zones; 1) Industrial Park Exception M5-1; Industrial Park Exception M5-2; and 3) Environmental Protection EP.

1.5 Public Use:

The Ontario Ministry of Health and Long-Term Care and its designated Local Health Integration Network (LHIN) direct millions of dollars of public funds to hospital facilities throughout the province in order that these 'public service facilities' (hospitals) may develop and provide public health care programs and services to the general residents of Ontario.

The term '**Public service facilities**' has now been incorporated in many of the province's upper tier planning documents and is defined to mean land, 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. *Public service facilities* do not include *infrastructure* (2014 PPS). Infrastructure includes works such as sewage, water and stormwater management systems, electricity transmission systems, communications, transit and pipelines and facilities.

A public hospital service facility that is significantly subsidized with public funds by the province, for the provision of public health programs and services for distribution to the general populace of Ontario, all under the jurisdiction of the province is deemed to be a bona fide Public Use.

2. Planning Review, Justification, Professional Planning Opinion and Required Planning Applications:

2.1 Planning Act, 2014 Provincial Policy Statement, Growth Plan for the Greater Golden Horseshoe and the County of Simcoe Official Plan:

In accordance to the Ontario *Planning Act* the adequate provision and distribution of health facilities is a matter of provincial interest which has been set out in a provincial policy statement (Section 2 & 3, *Planning Act*). Both the 2014 Provincial Policy Statement (2014 PPS) and the County of Simcoe 2016 Official Plan promote the provision of public health care and define **Public service facilities** to mean

‘land, 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’.

The Growth Plan for the Greater Golden Horseshoe (GPGGH) recognizes ‘**Community Infrastructure**’ as lands, buildings and structures that support the quality of life for people and communities by providing public services for health, education, recreation, socio-cultural activities, security and safety, and *affordable* housing. It is GPGGH policy that community infrastructure is to be ready and accessible and is considered essential to the viability of Ontario’s communities and critical to economic competitiveness, quality of life and the delivery of public services.

2.2 Town of Collingwood Official Plan:

Figure 3, entitled Designations for Community Services/Public Uses of the Town of Collingwood’s Official Plan, permits Public Uses to establish in all land use designations inclusive of the Industrial Park designation in which the proposed site is identified. The Collingwood General & Marine Hospital, a publically funded facility, is considered by the upper tier planning authorities as a Public Service Facility that supports and provides public health programs and services to all residents living in Ontario, the general area and in Collingwood specifically.

The establishment of the proposed new hospital under the term **Public service facilities** is considered a bona fide ‘Public Use’ and therefore permitted within any land use designation including the Town of Collingwood’s Industrial Park land use designation. Together with being a sanctioned Public Use, the site is serviced with municipal sewers, water and stormwater management facilities, abuts open public roads and will be grouped with Georgian College which is another Public Use. In conclusion the proposal to locate this Public service (hospital) facility on the subject lands is in conformity to the Town of Collingwood’s Official Plan.

2.3 Municipal Comprehensive Review: Employment Lands:

The Town has approximately 100 ha of available employment land of which 34 ha is estimated to be required to sustain new industrial uses to the year 2031 (County of Simcoe’s Employment Land Budget for the Town). This leaves approximately 66 ha of employment lands available within the Town that are considered surplus to the Town’s 2031 Employment Land Needs and Budget forecast.

The Collingwood General & Marine Hospital is desirous to utilize 12.1 ha of the Town's estimated 100 ha of available employment lands leaving approximately 87.9 ha of land for the purpose of accommodating future employment uses well in excess of the estimated 34 ha of land budgeted for the Town's Employment needs to the year 2031. The use of 12.1 ha of employment lands will leave the Town with approximately 87.9 ha of available employment lands which is more than enough employment land to comply to the findings and recommendations regarding real land found within the Town's Employment Land Needs Assessment and Budget

In consideration to the land area figures and conclusions of the Hemson Report (January 12, 2017) an amendment to the Official Plan is not required and that 87.9 ha of employment lands will remain available to the Town to accommodate its 34 ha of employment land needs to the year 2031 it is this planner's opinion a Municipal Comprehensive Review regarding Employment lands is unwarranted and not required.

2.4 Town of Collingwood Zoning By-law No.:2010-040:

Neither Public Use nor Public Service Facility is a defined use in the Town's Zoning By-law.

A hospital however is a defined use and is so defined:

"The use of land or building for establishments, licensed as hospitals, primarily engaged in providing diagnostic and medical treatment to in-patients with any of a wide variety of diseases or medical conditions. These establishments usually provide other services, such as out-patient services, diagnostic X-ray services, clinical laboratory services, pharmacy services and restaurants and gift shops".

Section 4 General Provisions subsection 4.2 entitled Public Use states "**Unless provided elsewhere in this Zoning By-law, a use** or government office under the jurisdiction of a public authority shall be permitted in any zone."

The Community Services CS Zone permits a hospital use. In today's upper tier planning documents a hospital is now termed a Public service facility. However the Town's Zoning By-law refers to a public service facility that provide health care programs and services as a hospital.

It is also noted the Industrial Park M5-1 or M5-2 zones do not specifically permit a Hospital or Public service facilities.

Based on the above proposed Public service facilities hospital use, a use described as a hospital may not be grouped with other generic Public uses but is distinctly identified and categorized as a standalone Public use. A Zoning By-law Amendment is therefore required to rezone the subject lands from the Industrial Park M5-1 and M5-2 zones to the Community Service Exception CS-E Zone to permit Public service facilities (Collingwood General & Marine Hospital) on the subject lands.

2.5 Town of Collingwood Site Plan Control By-law No.: 2010-082:

The Town's Site Plan Control By-law identifies all of the lands within the Town to be within the Town's Site Plan Control Area. Exceptions by land use type are listed but none of these exceptions include a hospital, community service use, public use or a public service facility and therefore the proposed Public Service Facility (Public Use/Hospital) is subject to site plan control. A Site Plan Control application is required to be submitted to the Town and Site Plan Control approval (Municipal or OMB) is required to be granted.

2.6 Opinion:

It is this professional planner's opinion that the establishment of a Public Service Facility/Public Use on the subject lands for the purpose of operating a general hospital use has had regard to those matters of provincial interest identified in the *Planning Act*, is consistent with the 2014 Provincial Policy Statement, and would be in conformity to; 1) the Growth Plan for the Greater Golden Horseshoe; 2) the County of Simcoe's Official Plan; and 3) the Town of Collingwood's Official Plan.

A Zoning By-law Amendment and Site Plan Control approval is required to be obtained from the Town of Collingwood or alternatively, the Ontario Municipal Board and if access is required onto Poplar Side Road (County Road No.32), approval of a County of Simcoe Entrance Permit is also required.

In addition subject to the status of the future owner (private or Public Authority) of the subject lands a Consent application and approval (Town or OMB) may also be required.

2.7 Zoning By-law Amendment Application, Site Plan Control Application and Consent Application:

Submit a Zoning By-law Amendment Application(s) to rezone:

- A. the subject lands: from the Industrial Park M5-1 and M5-2 zones to:
 - I. the Community Service-Exception CS-E Zone (maybe the CS-1 zone) for the purpose of:
 - a. permitting a Public Service Facility (hospital) use ; medical clinic; and pharmacy;
 - b. define a Public Service Facilities use (PPS and County, OP terms/definitions);
 - c. re-term and re-define the use ' hospital' to 'private hospital';
 - d. maximum height for the Public Service Facility shall be 36 m excluding the helipad, if required;
 - e. other exceptions to the provisions, as required; and
 - f. down zone, where possible, the adjacent M4, M5-1 and M5-2 zones to remove permitted land uses which may potentially result in adverse effects upon the proposed Public service facilities use;
 - II. submit a Site Plan Control Application complete with all required drawings; and
 - III. submit a Consent application: Determine whether lands are separately conveyable, whether the future owner of the site is a private owner or a Public Authority and confirm whether a consent application is required to convey the proposed Public Service Facility site to that future landowner.

2.8 Recommended Supporting Documentation:

1. Land Use Planning Justification Report c/w draft Zoning By-law Amendment;
2. Adaptive Re-use Analysis of the existing Hume Street hospital site;
3. Adverse Impact Assessment of existing industrial uses within the M4 and M5 zones (identify industrial uses to be removed/down zoned);
4. Functional Servicing Report for new location;
5. Environmental Phase 1 & 2 Soil Audit Assessments of proposed site;
6. Detailed Site Plan Control Application complete with all drawings, cost estimates and securities;
7. Stage 1 and Stage 2 Archaeological Assessment, Ministry of Tourism, Culture and Sport (MTCS) concurrence clearance; and
8. Letter of Authorization from Owner to submit applications and Letter of Intent to convey lands to CGMH or other (Consent Application if lands are not to be conveyed to a Public Authority).

Respectfully submitted;

A handwritten signature in cursive script that reads "Gordon H. Russell". The signature is written in dark ink and is positioned above the printed name.

Gordon H. Russell, MCIP, RPP,
Land Use Planner

APPENDICES

Planning Documents:

1. *Planning Act*, R.S.O. 1990, c. P.13 as amended;
2. 2014 Provincial Policy Statement (2014 PPS);
3. 2006 Growth Plan for the greater Golden Horseshoe, Office Consolidation January 2012;
4. The County of Simcoe Official Plan, December 2016;
5. The Town of Collingwood Official Plan, Consolidated December 2015;
6. Hemson Memorandum, January 12, 2017;
7. The Town of Collingwood Zoning By-law No. 2010-040, as amended;
8. The Town of Collingwood Site Plan Control By-law No. 2010-082, as amended.

Planning Document Review: Relevant Policies, Land Use Designations, Zones, Permitted Uses and Provisions

1. *Planning Act*, R.S.O. 1990, c. P.13 as amended:

Section 2, Part 1 Provincial Administration, 2. Provincial interest. 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, (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities. Section 3 (1) & (5) 'Policy statements and provincial plans' states that the Minister may issue policy statements on matters relating to municipal planning that in the opinion of the Minister are of provincial interest. As such 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 the comments, submissions or advice are provided; and
- b) Shall conform to the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be. 2006, c 23, s. 5.

2. 2014 Provincial Policy Statement (2014 PPS):

1.6 Infrastructure and Public Service Facilities:

1.6.1 Public service facilities shall be provided in a coordinated, efficient and cost-effective manner that considers impacts from climate change while accommodating projected needs. Public service facilities shall be coordinated and integrated with land use planning so 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.

1.6.3 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.

3. Growth Plan for the Greater Golden Horseshoe 2006, Office Consolidation, January 2012:

Section 3 Infrastructure to Support Growth:

3.1 Context:

Ready and accessible public infrastructure is essential to the viability of Ontario's communities and critical to economic competitiveness, quality of life and the delivery of public services.

Investment in community infrastructure – such as hospitals, long term care facilities, schools and affordable housing – should be planned to keep pace with changing needs and to promote more complete communities.

3.2.6 Community Infrastructure:

1. Community infrastructure planning, land-use planning, and community infrastructure investment will be co-ordinated to implement this Plan.
2. Planning for growth will take into account the availability and location of existing and planned community infrastructure so that community infrastructure can be provided efficiently and effectively.
3. An appropriate range of community infrastructure should be planned to meet the needs resulting from population changes and to foster complete communities.
4. Services planning, funding and delivery sectors are encouraged to develop a community strategy to facilitate the co-ordination and planning of community infrastructure with land use, infrastructure and investment through a collaborative and consultative process.

4. County of Simcoe Official Plan:

4.2 Community Facilities and Services:

- 4.2.1 Public service facilities should be directed to settlements, but may be directed outside of settlements.
- 4.2.2 Community facilities shall be connected to municipal sewage services and municipal water services.
- 4.2.3 Before consideration is given to developing new infrastructure and public service facilities, opportunities for adaptive re-use should be considered, wherever feasible and subject to local municipal official plans.
- 4.2.4 Community facilities and 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.

5. Town of Collingwood Official Plan:

Schedule 'A' – Land Use Plan: Industrial Park land use designation

3.2 Community Services

3.2.3 Policies

3.2.3.2 Community service/public uses and areas shall be permitted in accordance with Figure 3.

3.2.3.4 Community service/public uses may be zoned in separate categories in the implementing Zoning By-law.

- 3.2.3.5 As far as possible, a permitted community service/public uses shall be situated in close proximity to major transportation routes and serviced by active transportation routes.
- 3.2.3.6 The design of a new community service/public use, particularly new buildings or structures, shall be in keeping with the general character of the surrounding neighbourhood or area.

Figure 3 Designations For Community Services/Public Uses (1)
 (Note 1: for public uses, which are permitted in all designations, only preferred locations are shown)
 Hospital: Preferred locations/designations for a Hospital are the Residential and Commercial designations.

3.17 Redesignation of Industrial Lands

It is a policy of this Plan that applications for re-designation of Industrial and/or employment lands to another land use category may only be permitted after confirmation that the Municipal Comprehensive Review completed in 2007 is still relevant. If required, a further Municipal Comprehensive Review shall demonstrate that: that there is a need for the conversion. the land is not required for employment purposes over the long term; the municipality will meet the employment forecasts allocated pursuant to the Growth Plan; the re-designation will not adversely affect the overall viability of the existing or potential employment area, and achievement of the intensification, density targets and other policies of the Growth Plan; there is existing or planned infrastructure to accommodate the proposed conversion; the re-designation respects natural features, buffers and open space corridors which may define land use categories; and, cross-jurisdictional issues have been considered.

In addition, the application for re-designation and/or Comprehensive Review shall determine whether the proposed land use conversion will impact any of the following Town services: allocation of sewer and water capacity for the subject area; transportation and transit infrastructure; stormwater management; the demand for parkland and recreational facilities including trails and walkways.

6. Hemson Memorandum, dated January 12, 2017

- I. The Town of Collingwood’s employment land inventory has been updated and includes roughly 100 ha of long-term development supply;
- II. An employment land need of an estimated 34 ha has been identified through the Simcoe County Employment Land budget indicating the Town has a potential surplus in the amount of lands designated required to meet its employment forecast.

7. Town of Collingwood Zoning By-law No. 2010-040, as amended:

Schedule ‘A’ – Map 28

Proposed CGMH Site of 30 acres is identified as zoned Environmental Protection EP, Industrial Park Exception M5 -1 and Industrial Park Exception M5-2.

Section 4.0 General Provisions

Sub-section 4.2 Public Uses

Sub-section 4.2.

Unless provided elsewhere in this Zoning By-law, a use or government office under the jurisdiction of a public authority shall be permitted in any zone.

Section 8.0 Industrial Zones

Table 8.1.1.1 Industrial Permitted Uses Zone M5

None of the following uses are listed as a permitted use within the Industrial Park M5 Zone or the Exception Zones M5-1 or M5-2 or the Environmental Protection EP Zone; 1) Hospital; 2) Community Service; or 3) Public Service Facility.

Section 9.0 Community Services, Environmental Protection, Recreation, & Rural Zones

Table 9.1.1.1 Community Services, Environmental Protection, Recreation and Rural Permitted Uses

The Community Service CS Zone lists the following health related uses as permitted; 1) Ambulance service; 2) Hospital; 3) Hospice; and 4) Nursing facility.

8. Town of Collingwood Site Plan Control By-law No. 2010-082 , as amended:

Section 1.

(a) All lands situated within the municipal boundaries of the Town of Collingwood and in a....Community Service Zone classification including...community service/public uses in Collingwood Zoning By-law No. 2010-040, as amended from time to time, are subject to section 1 (b), hereby designated as a site plan control area pursuant to section 41 of the *Planning Act* or any successor legislation thereto.

(b) The following lands shall not be subject to site plan control:

(i) all areas in a Residential zone classification ... used for single-detached dwellings, semi-detached dwellings, small-lot detached dwellings and duplex dwellings;

(ii) all areas in a Greenbelt zone classification ... used for single-detached residential and agricultural uses.

Section 2. No person shall undertake any development within a site plan control area unless the Council of the Town of Collingwood... has approved plans or drawings in accordance with subsection 41 (4) of the *Planning Act* and imposed any conditions in accordance with subsection 41 (7) of the *Planning Act*.

Section 4. ... classes not subject to site plan control.... No exception for a hospital use, a community service use or a public use.

Glossary of Planning Terms, Definitions and Provisions:

Planning Act, R.S.O. 1990, c. P.13, as amended:

1. Public Body: means a municipality, a local board, a ministry, department, board, commission, agency or official of a provincial or federal government or a First Nation (*PA*, R.S.O. 1990).

2014 Provincial Policy Statement (2014 PPS):

1. Employment Area: Areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities (PPS 2005).

2. Sensitive Land Uses: means buildings, amenity areas, or outdoor spaces where routine or normal activities occurring at reasonably expected times would experience one or more *adverse effects* from contaminant discharge generated by a nearby *major facility*. *Sensitive land uses* may be a part of the natural or built environment. Examples may include but are not limited to: residences, day care centres, and educational and health facilities (2014 PPS).

3. Public Service Facilities: means land, 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. *Public service facilities* do not include infrastructure (2014 PPS).

Growth Plan for the Greater Golden Horseshoe 2006, office Consolidated, January 2012:

1. Community Infrastructure: Community Infrastructure refers to lands, buildings and structures that support the quality of life for people and communities by providing public services for health, education, recreation, socio-cultural activities, security and safety, and *affordable* housing (GPGGH).
2. Municipal Comprehensive Review: An official plan review, or an official plan amendment, initiated by a municipality that comprehensively applies the policies and schedules of this Plan (GPGGH).

County of Simcoe Official Plan, December 2016:

1. Public Service Facilities: means land, 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. They do not include infrastructure (CoSOP).

Town of Collingwood Official Plan, Consolidate December 2015:

1. Public Authority: Shall mean Federal, Provincial, County or municipal agencies, and includes and Commission, Board, authority or department established by such agency (ToCOP).

Town of Collingwood Zoning By-law No.2010-040, as amended:

1. Hospital: The use of land or building for establishments, licensed as hospitals, primarily engaged in providing diagnostic and medical treatment to in-patients with any of a wide variety of diseases or medical conditions. These establishments usually provide other services, such as out-patient services, diagnostic X-ray services, clinical laboratory services, pharmacy services and restaurants and gift shops (ToCZBL).
2. Public Authority: The Town of Collingwood, including its commissions or boards and COLLUS, any federal or provincial ministry, a court of law, a local conservation authority, and any corporation established under the Municipal Act, S.O. 2001, c. 25, as amended, including its commissions or boards (ToCZBL).
3. Public Use: Unless provided elsewhere in this Zoning By-law, a use or government office under the jurisdiction of a public authority shall be permitted in any zone (S 4.2 ToCZBL).

Town of Collingwood Site Plan Control By-law No. 2010-082, as amended:

1. Section 2. Development shall mean development as defined in subsection 41 (1) of the *Planning Act*.