



January 5, 2023

Ministry of Municipal Affairs  
Office of the Minister  
777 Bay Street, 17<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Ministry of Long-Term Care  
Office of the Minister  
400 University Avenue, 6<sup>th</sup> Floor  
Toronto, ON M7A 1N3

Attn: Minister Clark

Attn: Minister Calandra

**Re: Approval of New Prescott-Russell Official Plan (ERO number 019-6029),  
Bed Allocation for St-Viateur Long-Term Care in Limoges, Ontario  
& Coordination of Provincial Interests**

177 Colonnade Road  
Suite 101  
Ottawa, Ontario  
Canada  
K2E 7J4  
Telephone  
613.745.2213  
Fax  
613.745.3491

Dear Minister Clark and Minister Calandra:

Earlier this year, Genesis Gardens Inc. received an allocation of 71 new long-term care beds and 57 eligible beds for redevelopment from the Ministry of Long-Term Care (see Attachment 'A' to this letter). These 128 beds will be accommodated in a new long-term care development in Limoges, Ontario.

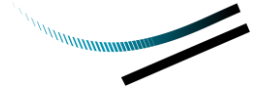
Dillon Consulting Limited (Dillon) has been retained by Genesis Gardens Inc. to seek approvals under the Planning Act to facilitate this much-needed long-term care development. However, if the new official plan for the United Counties of Prescott-Russell is approved by the Province as currently drafted, it could hinder the expediency of this new long-term care development. This letter is our request on behalf of Genesis Gardens Inc. for the Ministries to coordinate on this matter of Provincial interest. This letter provides a background and explanation of the concerns, as well as some proposed solutions for the Ministry of Municipal Affairs to consider.

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### **Background and Context: The Existing St-Viateur Nursing Home and Genesis Retirement Home has Served the Community for 66 Years**

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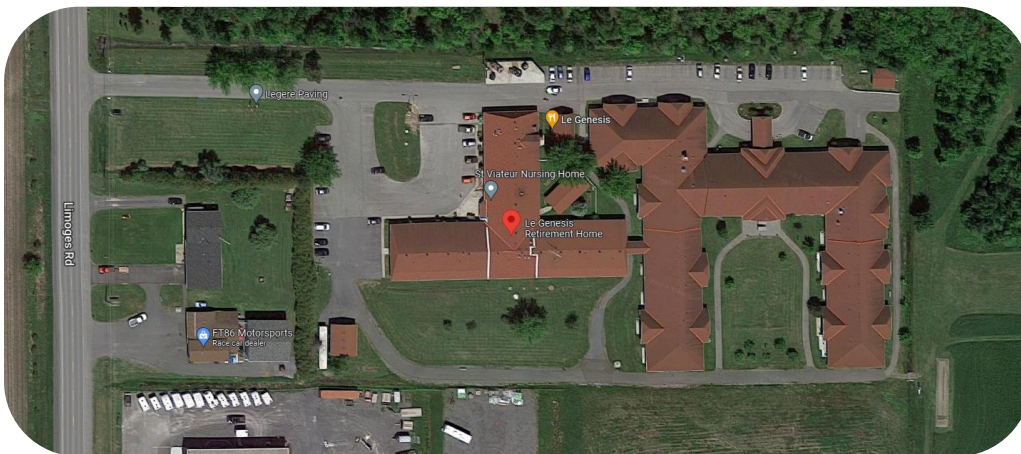
Located at 1003 Limoges Road, in Limoges, Ontario, the existing St-Viateur Nursing Home which includes the Genesis Retirement Home, has served the community for 66 years (see *Figure 1*). The St-Viateur Nursing Home was first built in the village of Limoges in 1957 and re-opened in its current location in 1986. The Genesis Retirement Home was added to St-Viateur Nursing Home to create a larger building and was opened in 2006. This institutional development is located in a rural setting;



however, municipal water and sewer were extended to provide servicing for the development.

The development is designated “Rural” in the current Prescott-Russell official plan (November 2018 Office Consolidation). It is zoned “I – Institutional” in the current The Nation Municipality zoning by-law, and “Nursing Home” is a permitted use in Section 5.11.1 of the zoning by-law.

Figure 1: St-Viateur Nursing Home and Genesis Retirement Home,  
1003 Limoges Road, Limoges, Ontario



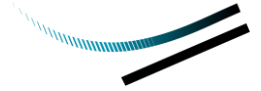
### The Proposed Long-Term Care Development: The New St-Viateur at 2172 Route 500 West, Limoges

The owners of the existing St-Viateur/Genesis development have **acquired the immediately abutting property to the east**, municipally addressed as 2172 Route 500 West (see Figure 2). A new St-Viateur long-term care home is proposed for development on the site (see Figure 3).<sup>1</sup> We understand that the new St-Viateur long-term care home would tie-in to the municipal water and sewer connection that currently serves the existing St-Viateur/Genesis development.

The new St-Viateur site is designated “Rural” in the current Prescott-Russell official plan. The lands are zoned “A – Agricultural” in The Nation Municipality zoning by-law.

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<sup>1</sup> The existing Genesis Retirement Home will remain at 1003 Limoges Road; the owners have not yet decided how the space currently occupied as the nursing home portion will be repurposed.



To initiate the development approvals process, a formal pre-application consultation meeting was held with staff from United Counties of Prescott-Russell (Prescott-Russell), The Nation Municipality, and South Nation Conservation. We have confirmed the development applications required for the new St-Viateur development and the technical issues that need to be addressed. **At this time, we have no concerns with the applications that are required for the new St-Viateur long-term care home and we believe that the technical issues are resolvable.** Work is currently underway to prepare the submission materials for the re-zoning of 2172 Route 500 West.

Figure 2: 2172 Route 500 West, Limoges, which is the proposed site for the new St-Viateur long-term care home



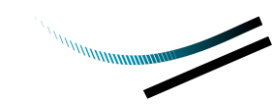
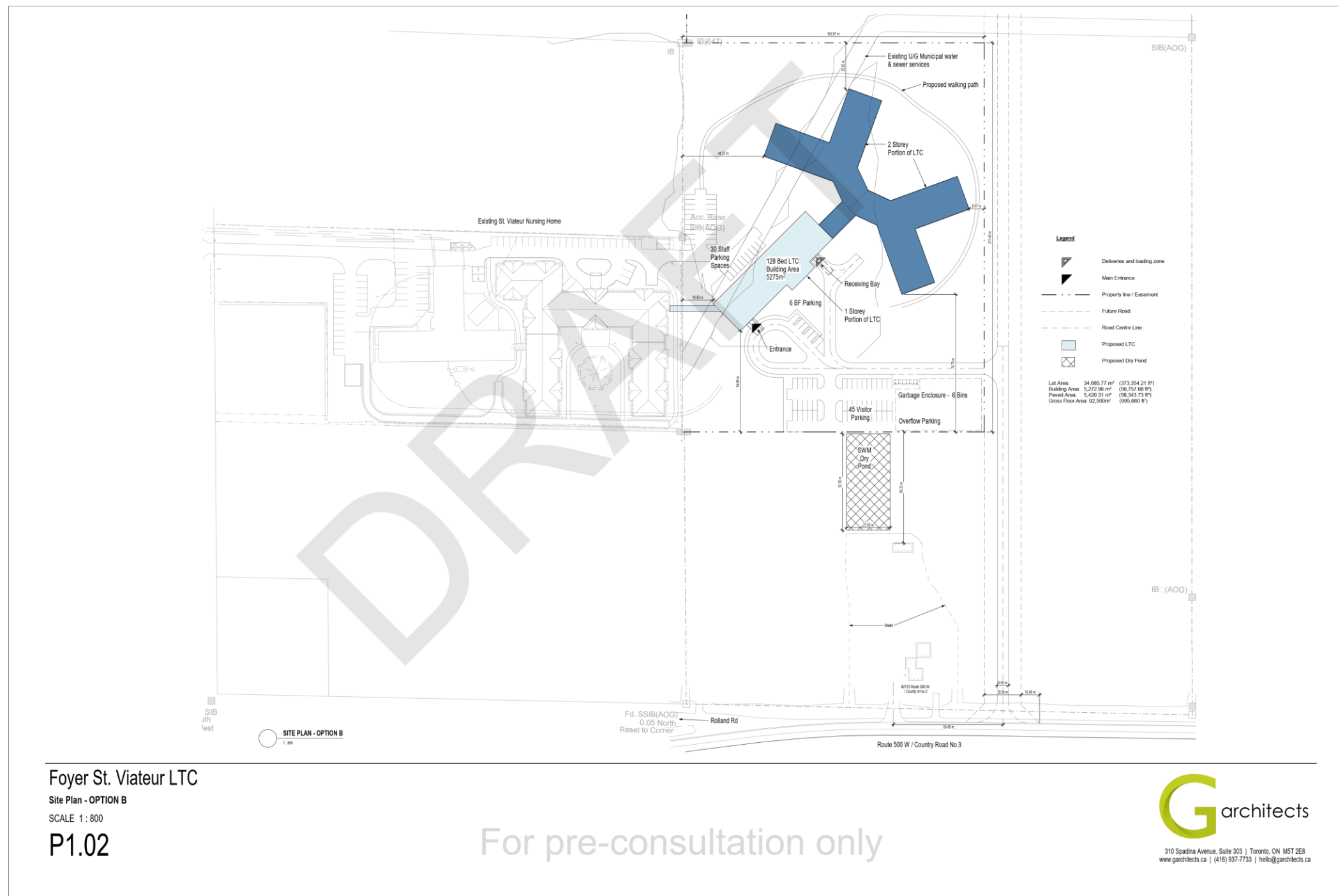
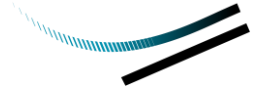


Figure 3: Pre-consultation sketch for the new St-Viateur long-term care home (source: G Architects)





## **A Policy Change in the Draft New Prescott-Russell Official Plan Creates Three Concerns for both Genesis and the New St-Viateur Development**

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**The Current Official Plan is Permissive:** As noted above, both 1003 Limoges Road and 2172 Route 500 West are designated “Rural” in the current Prescott-Russell Official Plan. Section 2.5.3 of the current official plan permits the following:

“Institutional Uses

1. institutional uses such as churches, cemeteries, and community halls”

It is our opinion that the term “such as” is **permissive**. This means that churches, cemeteries, and community halls are institutional uses; however, we see this list as not exhaustive. The zoning in effect for the Genesis Retirement Home reinforces this concept because the zoning expressly permits “nursing homes”.

Under the current official plan, the Genesis Retirement Home is a permitted land use; furthermore, in our opinion, the new St-Viateur long-term care home is a permissible land use (subject to re-zoning).

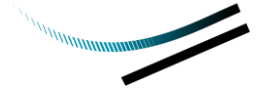
**The Draft New Official Plan is Restrictive:** Based on our review of the Draft New Official Plan for Prescott-Russell (September 2022), we note a change in the policy wording and Section 2.7.3 reads as follows:

“11) Institutional uses limited to churches, cemeteries, schools, daycare and community halls;”

It is clear that the new policy using the phrase “limited to” is **restrictive**. This means that churches, cemeteries, schools, daycare, and community halls are the only uses that are permitted. Although allowed by current policy, the new policy wording means that nursing homes, retirement homes, or long-term care homes are not permitted in the Rural land use designation. As a result, the following concerns arise:

1. If approved as written, the policy in the draft new official plan would **change the status of the Genesis Retirement Home from a permitted use to a legally non-conforming use**;
2. If approved as written, the policy in the draft new official plan would **negate the current ability to promptly seek the re-zoning of 2172 Route 500 West for the new St-Viateur long-term care home**; and,





3. If approved as written, the policy in the draft new official plan would **trigger the requirement for an official plan amendment to develop the new St-Viateur long-term care home at 2172 Route 500 West.**

### **The Provincial Policy Statement Supports Long-Term Care Development and the Rationale for a Restrictive Policy in the Draft New Prescott-Russell Official Plan is Not Clear**

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We note the following policy in the Provincial Policy Statement (2020) [emphasis added]:

- “1.1.1 Healthy, liveable and safe communities are sustained by:
- b) ...institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;”

It is very clear in the policy that the Province views “long-term care homes” as institutional land uses. We share this same point of view, and by extension we would include retirement homes as part of this interpretation.

The Provincial Policy Statement also includes “long-term care services”<sup>2</sup> in the definition of “public service facilities”. Based on this, we can further note:

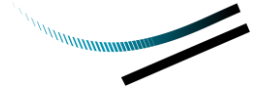
- The Provincial Policy Statement Section 1.1.4.1 states that, “Healthy, integrated and viable rural areas should be supported by... using rural infrastructure and public service facilities efficiently;” and,
- Guidance is provided for public service facilities in Section 1.6 but does not restrict them from locating in rural areas.

Our anecdotal understanding of the pressing need for long-term care beds in Ontario (particularly in rural eastern Ontario) underscores the importance of facilitating long-term care development, rather than restricting it.

Based on the above provincial policies, the rationale to restrict institutional land uses and specifically exclude long-term care in the draft new official plan’s Rural land use designation is not clear. It is our opinion that the policy needs to be refined before the new official plan is approved by the Minister of Municipal Affairs.

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<sup>2</sup> We note that ‘services’ is different than a ‘home’; however, it is difficult to provide long-term care services outside of a hospital unless it is provided at a long-term care home, so we view ‘services’ as synonymous with ‘home’ in this instance.



## The Draft New Prescott-Russell Official Plan is Pending Ministerial Approval – Provincial Coordination and a Ministerial Modification Can Resolve the Above Concerns

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At the outset of this letter, we noted that the Ministry of Long-Term Care has allocated 71 new and 57 redeveloped beds for the new St-Viateur long-term care home. It is also noteworthy that there has been a media announcement on this allocation (see Attachment ‘B’ to this letter).

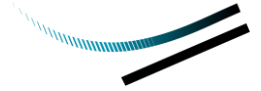
The draft new official plan for Prescott-Russell is currently pending approval by the Minister of Municipal Affairs. This creates an excellent opportunity to coordinate Provincial interest and resolve the three concerns noted above.

We would like to respectfully request that the Minister of Municipal Affairs **approve the new Prescott-Russell official plan with a ministerial modification that resolves our three concerns**. We have provided some proposed solutions<sup>3</sup> for the Ministry of Municipal Affairs’ consideration:

- **Option 1 (preferred):** Rephrase draft policy 2.7.3 to read:  
“11) Institutional uses including but not limited to long-term care/retirement homes and similar/related uses, churches, cemeteries, schools, daycare and community halls, and accessory uses.” This returns the policy to the more permissive nature of the current official plan and provides additional clarity that the policy is broadly permissive.
- **Option 2:** Rephrase the draft policy 2.7.3 to read:  
“11) Institutional uses limited to such as long-term care/retirement homes and similar/related uses, churches, cemeteries, schools, daycare and community halls, as well as accessory uses.” Similar to Option 1, this returns the policy to the more permissive nature of the current official plan and provides additional clarity that the policy is broadly permissive.
- **Option 3:** Add a site specific “notwithstanding” policy that permits the current Genesis retirement home and would permit the new St-Viateur long-term care home (we would be pleased to work with staff on proposed wording, if this option was amenable to the Ministry of Municipal Affairs); or,
- **Option 4:** We would be pleased to discuss an alternative modification that could effectively resolve the concerns raised.

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<sup>3</sup> The proposed policy wording for Options 1 and 2 are without prejudice.



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The allocation of 128 long-term care beds for the new St-Viateur development and approval of the new Prescott-Russell official plan are both matters of Provincial interest. We have identified some viable options to resolve the concerns raised in this letter that would facilitate the new St-Viateur development.

I trust that the above information is clear and we look forward to a positive response. To help maintain the overall project schedule of the new long-term care development, feedback within two (2) weeks is kindly requested.

If I can be of any assistance to either Ministry on this matter, please contact me at email rbaksh@dillon.ca or cell phone 613.715.1274.

Yours sincerely,

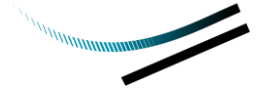
**Dillon Consulting Limited**

Mr. Rory Baksh, MCIP, RPP  
Partner

cc: Brian Pollard, Ministry of Long-Term Care  
Mike Elms, Ministry of Municipal Affairs  
Dan Ethier, Ministry of Municipal Affairs  
Louis Prevost, United Counties of Prescott-Russell  
Guylain Lafleche, The Nation Municipality

Our file: 22-5310





## Attachment 'A': Ministry of Long-Term Care Letter Allocating Beds to St-Vaiteur, April 28, 2022

Ministry of  
Long-Term Care  
Office of the Minister  
400 University Avenue, 6th Floor  
Toronto ON M7A 1N3  
Tel.: 416 325-6200

Ministère des  
Soins de longue durée  
Bureau du ministre  
400, avenue University, 6<sup>e</sup> étage  
Toronto ON M7A 1N3  
Tél.: 416 325-6200



April 28, 2022

337-2022-116

Mr. Richard Marleau  
President  
Genesis Gardens Inc.  
1003 Limoges Road South  
Limoges ON K0A 2M0

Dear Mr. Marleau:

**RE: Long-Term Care Development Project (St. Vaiteur - Liomoges – PROJ 1137)**

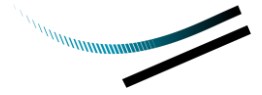
Thank you for your application for the St. Vaiteur - Liomoges project in Embrun. I am pleased to advise you that the Ministry of Long-Term Care (the "ministry") will allocate 71 new long-term care beds and 57 eligible beds for redevelopment to Genesis Gardens Inc., subject to the approval of your project and meeting all the conditions and requirements as set out in the *Long-Term Care Homes Act, 2007* or successor legislation, with respect to the licensing and operation of the beds, and other conditions to be stipulated by the ministry.

This allocation is part of the government's commitment to create new capacity and update existing beds to modern standards.

Brian Pollard, Assistant Deputy Minister, Long-Term Care Capital Development Division, will be writing to you to provide further details, including applicable conditions, regarding this allocation and next steps.

Our government is investing in new and redeveloped long-term care beds in Ontario as we work to create a 21st-century long-term care sector that is resident-focused, improving quality of care and quality of life for seniors and easing hallway health care. It is vital to improve access to long-term care beds to ensure residents get the care they deserve, when and where they need it.

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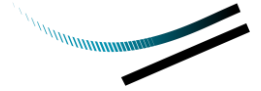
Mr. Marleau

Please accept my congratulations on behalf of the Government of Ontario. We look forward to working with you to end hallway healthcare in Ontario and expand access to long-term care across our province.

Sincerely,

Hon. Paul Calandra  
Minister of Long-Term Care

- c: Bill Hatanaka, Board Chair, Ontario Health
- Matthew Anderson, President and Chief Executive Officer, Ontario Health
- Anna Greenberg, Chief Regional Officer (Toronto & East Region), Ontario Health
- Nancy Matthews, Deputy Minister, Ministry of Long-Term Care



## Attachment 'B': Media Announcement on the St-Viateur Allocation

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Last week, while I was in Prescott-Russell to mark the completion of the redevelopment project of the Hawkesbury and District General Hospital, I also had the privilege of making multiple stops in the community to announce how our government is getting it done for the region.

I started the day by announcing *Connecting the East: a draft transportation plan for eastern Ontario*, which includes more than 50 actions to help build a safe, reliable, and connected transportation system that keeps people and goods moving within and across the region. These actions include rehabilitating and expanding highways, improving transit and intercommunity bus options, and supporting economic development opportunities to ensure that the region's transportation system is ready for the future.

Afterwards, I made a stop at the Employment Services Centre of Prescott-Russell to see firsthand, how the centre is supporting and training workers for good jobs. Our government is investing \$836,000 in the Centre with a mandate to focus on skills development to support people who face barriers to employment by accompanying them through a fast-track academic course, apprenticeships in the workplace, and job shadowing. This investment will also help develop additional qualifications for daycare staff. I was impressed by the innovative work done by the team.

Then, I had the pleasure to stop in Limoges to announce that our government is adding 71 new beds and 57 upgraded beds at Foyer St-Viateur Nursing Home. This is part of the government's \$6.4 billion commitment to build more than 30,000 net new beds by 2028 and 28,000 upgraded long-term care beds across the province. Our seniors who receive long-term care deserve comfortable accommodation close to their families and loved ones where they can receive the support they need in the language of their choice. Together with the Francophone community and partners in the long-term care sector, our government continues to move forward with and promote innovative solutions to improve the provision of long-term care services in French throughout the province. The dedicated staff are ensuring our seniors are well taken care of by providing a minimum of four-hours of care per day.

It was a full day of seeing how our government is building infrastructure, working for workers, and keeping Ontario open by expanding hospitals and building long term care facilities in Prescott-Russell, and throughout Ontario.

