

## **Attachment-8 Planning Analysis**

### **Provincial Policy Statement, 2020**

The Provincial Policy Statement (PPS), 2020, provides direction on matters of provincial interest related to land use planning and development. Section 1.1 of the PPS promotes efficient land use and development patterns that support sustainability by promoting strong, liveable, healthy and resilient communities, protecting the environment and public health and safety, and facilitating economic growth. Policy 1.1.1 of the PPS encourages creating healthy, livable and safe communities, including promoting efficient development patterns and accommodating an appropriate affordable and market-based range and mix of residential types [1.1.1a),b)]. Improving accessibility for persons with disabilities and older persons by addressing land use barriers which restrict their full participation in society [1.1.1f)].

Section 1.4 focuses on housing, providing an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area. This includes establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households and which aligns with applicable housing and homelessness plans [1.4.3 a)]. Further, the PPS refers to permitting all housing options required to meet the needs of residents, including special needs requirements, through both intensification and redevelopment [1.4.3 b)]. This section further directs that new housing is to be directed to locations where appropriate levels of infrastructure and public services are and will be available to support anticipated needs [1.4.3 c)].

This application to permit the site to be redeveloped to provide 32 supportive housing units is consistent with the policies of the PPS. The proposed development represents a compact form of development, and the reuse of an existing building within the City's settlement area that will allow the efficient use of land, infrastructure and public service facilities where infrastructure is already available and transit is available.

As supportive housing, the site would provide an alternative residential type to the area and contribute to achieving an appropriate range of housing types and densities to help the City of Guelph meet projected requirements for current and future residents. The site would provide affordable special needs housing which aligns with both the PPS and the City's Affordable Housing Strategy.

The City's Official Plan is meant to be the main instrument for implementation of the PPS in Guelph [4.7] and a more detailed review of proposed Zoning By-law Amendment's consistency with policies in the City's Official Plan will be outlined later in this analysis.

## **Provincial Growth Plan for the Greater Golden Horseshoe (A Place to Grow)**

The Growth Plan for the Greater Golden Horseshoe, 2019 (the Growth Plan) is issued under the Places to Grow Act and works to support the achievement of complete communities, manage forecasted population and employment growth, protect the natural environment, and support economic development. While the PPS as outlined above provides broader policy direction on matters of provincial interest, the Growth Plan provides more focused direction for development within the Greater Golden Horseshoe area.

The policies of the Growth Plan focus on the key themes of building more compact and vibrant communities; directing a significant share of new growth to existing built-up areas of the City; promoting the development of transit-supportive densities and the use of active transportation methods; and creating complete communities through ensuring a healthy mix of residential, employment and recreational land uses.

Sections 2.2.1 and 2.2.2 of the Growth Plan identify how population growth to the horizon year of 2051 will be accommodated within the 'Delineated Built-up Areas' of the City. The subject lands are located within the Delineated Built-up Area. These sections contain policies related to intensification, the creation of complete communities and efficient use of infrastructure and public service facilities. Specific to the creation of complete communities is the goal of improving social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes and the provision of a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes [2.2.1.4].

The proposed Zoning By-law Amendment conforms to the policies of these sections by:

- Providing supportive housing units, a housing form that is proposed to be affordable and meet an identified housing gap in the City;
- Directing redevelopment and intensification to lands within the existing delineated built-up area of the City;
- Promoting redevelopment that supports active and public transportation options;
- Adding new housing units that contributes to enhancing and broadening the mix of housing types and options available;
- Further contributing to the mix of land uses in the surrounding area and building a complete community through redevelopment that is in close proximity to existing services, public transit and public open space; and
- Makes efficient use of existing municipal infrastructure and public service facilities.

Section 2.2.6 outlines policies for housing throughout the Greater Golden Horseshoe, including the following policies:

- Policy 2.2.6.1 supports housing choice and affordable rental housing through the achievement of the minimum intensification and density targets of the Growth Plan, land use planning and financial tools, aligning land use planning with housing and homelessness plans, and through official plan policies, designations and zoning by-laws.
- Policy 2.2.6.2 expands on the previous policy to support the achievement of complete communities through intensification, meeting density targets, considering the range and mix of housing options and densities of the existing housing stock, and planning to diversify overall housing stocks across a municipality.

The Zoning By-law Amendment application at 721 Woolwich Street proposes 32 supportive housing units which would contribute to the range and mix of housing options in the City. The units are proposed to be affordable and will address the goals of the City's Affordable Housing Strategy.

Overall, the proposed redevelopment of the site with compact and efficient form of development that will be served by adequate infrastructure and public service facilities in the immediate built-up neighbourhood. The development will contribute to the overall intensification of the City's built-up area by creating 32 dwelling units at a residential density of approximately 80 units per hectare, together with the front portion of the building which provides staff, office and support space.

Based on the above summary of policies, Planning staff are of the opinion that the proposed Zoning By-law Amendment is consistent with and conforms to A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

### **Official Plan Conformity**

#### **Mixed Use Corridor Land Use Designation**

The Site is designated Mixed Use Corridor in the Official Plan which is intended to serve both the needs of residents living and working on-site, in nearby neighbourhoods and employment districts and the wider city as a whole. The designation permits a wide range of uses including commercial, retail, office, institutional, hotels and medium and high density multiple unit residential buildings. A maximum height of six storeys is permitted in this designation and standalone residential buildings should have a density between 100 and 150 units per hectare.

The proposed redevelopment of 721 Woolwich Street to supportive housing meets the requirements of the land use designation. The building is composed of 32 dwelling units together with an office and service area on the front or westerly side of the building meant to accommodate offices for support staff and provide amenities for the residents. The site is not considered to be standalone residential, because of the support space and staffing included in the supportive housing use.

The residential portion of the proposed development would be considered medium density at approximately 80 units per hectare which is identified as a permitted use in the designation together with office, service and amenity space at the front of the building which creates a mix of uses within the site as a whole.

### **Special Needs Housing**

The Official Plan has policies specific to the development of Special Needs Housing, which is defined in the City's Official Plan as:

Any housing, including dedicated facilities, in whole or in part, that is used by people who have specific needs beyond economic needs, including but not limited to, needs such as mobility requirements or support functions required for daily living. Examples of special needs housing may include, but are not limited to, housing for persons with disabilities such as physical, sensory or mental health disabilities, and housing for the elderly. For the purposes of this Plan, it also includes group homes, emergency shelters, special care facilities for persons with disabilities and housing for seniors (rest homes, palliative care, nursing homes).

Supportive housing is an example of special needs housing as it generally refers to a combination of housing assistance and supports that enable people to live as independently as possible in their community.

Section 9.2.2 sets out that special needs housing shall be permitted within land use designations where residential uses are permitted and that the City should work with other levels of government to support the development and retention of special needs housing throughout the City. It also specifies that when a zoning by-law amendment is required to allow special needs housing, consideration should be given to:

- i) The nature of the proposed use and its *compatibility* with the immediate neighbourhood;
- ii) The objective of community integration;
- iii) The existing *Zoning By-law* regulations;
- iv) Specific performance standards such as dwelling type, buffering, minimum amenity area and minimum floor space; and
- v) Access to community facilities such as education, public transit and recreation.

The proposed redevelopment at 721 Woolwich Street to develop supportive housing addresses these considerations in the following ways. The site is meant to house people that experience chronic homelessness and need support to stay housed and live with independence. The site is located on the edge of the Mixed Use Corridor which permits multi-unit residential buildings and across the street and to the east

are areas designation medium and high density residential which also consist of multi-unit residential dwellings. The location allows the residents to be within walking distance of many retail and commercial services. There is good access to public transit on Woolwich Street, recreation in the parks and trails system via Riverside Park and support staff and services onsite to connect residents with other community facilities as needed. For these reasons, the site location is well suited to the objective of community integration for the future residents.

Supportive Housing is a use already defined in the Zoning By-law and staff have considered the proposed by-law amendment and site layout in its surrounding context. The layout of the existing building means that the dwelling units are mostly set back from the street along the northerly property line and front onto Marilyn Drive. The layout limits the size of the units to the current building configuration. There is some limited rear yard space, but the proposal would use that space to provide a buffer to the adjacent property to the east and bring the common amenity area to the interior of the site where many of the proposed dwelling units would front onto it, creating an easily accessed amenity area and a transition between the dwelling units and the street.

### **Criteria for Multi-Unit Residential Buildings**

General criteria for multi-unit residential buildings and intensification within existing residential neighbourhoods are contained in Policy 9.3.1.1 and are to be used to assess development proposals for multi-unit residential development.

The analysis below demonstrates how each of the eleven criteria are met for the proposed 32 unit supportive housing redevelopment.

- 1. Building form, scale, height, setbacks, massing, appearance and siting are compatible in design, character and orientation with buildings in the immediate vicinity.*

The proposed development is an adaptive reuse of the existing one storey motel building, which is primarily accessed and oriented along the Marilyn Drive frontage. Across the street on Marilyn Drive are similarly oriented townhouses and further to the east on Marilyn Drive are several apartment buildings of various sizes that front onto the street as well. The applicant is proposing to upgrade the building and its appearance from both Woolwich Street and Marilyn Drive as shown in the proposed renderings in Attachment-7.

- 2. Proposals for residential lot infill will be compatible with the general frontage of lots in the immediate vicinity.*

The development proposal will not be creating new infill lots, so this provision does not apply.

3. *The residential development can be adequately served by local convenience and neighbourhood shopping facilities, schools, trails, parks recreation facilities and public transit.*

There are a number of local service and retail uses nearby, with commercial plazas on the southeast and northwest corners of the intersection of Speedvale Ave and Woolwich Street, a variety of service and commercial uses along Woolwich Street and a larger commercial node with a grocery store at Woodlawn Road and Woolwich Street. Trails and parks are close by in Riverside Park and public transit is available nearby on Woolwich Street.

4. *Vehicular traffic generated from the proposed development will not have an unacceptable impact on the planned function of the adjacent roads and intersections.*

Limited traffic will be generated from the proposed site with no impact on the surrounding street network. Few, if any, of the residents would own a vehicle and generally no more than five support staff would be on site at one time.

5. *Vehicular access, parking and circulation can be adequately provided and impacts mitigated.*

A single vehicular access is provided to the site from Marilyn Drive. Parking has been reduced to 13 spaces, anticipating that parking will mainly be used by staff and visitors.

6. *That adequate municipal infrastructure, services and amenity areas for residents can be provided.*

Engineering staff have confirmed that adequate water and wastewater servicing capacity is available for the proposed development. The applicant has indicated in their preliminary engineering drawings that stormwater will be entirely accommodated for on-site. The site is near transit, local retail and services and adequate on-site amenity area has been provided for residents.

7. *Surface parking and driveways shall be minimized.*

The site's surface parking will be significantly reduced from the current motel parking lot. The site design is being reconfigured to provide one access from Marilyn Drive, 13 parking spaces and a pick up/drop off area.

8. *Development shall extend, establish or reinforce a publicly accessible street grid network to ensure appropriate connectivity for pedestrians, cyclist and vehicular traffic, where applicable.*

The redevelopment of this site will improve connections for residents to the street. Appropriate connectivity to the street network will be reviewed

through site plan approval to ensure good pedestrian connections through sidewalk connections.

9. *Impacts on adjacent properties are minimized in relation to grading, drainage, location of service areas and microclimatic conditions, such as wind and shadowing.*

Little change is being made to the existing site layout, so there are no anticipated impacts related to the above-noted factors.

10. *The development addresses public safety, identified public views and accessibility to open space, parks, trails, and the Natural Heritage System, where applicable.*

The proposed redevelopment to supportive housing does not impact public safety, public views or accessibility to any open spaces.

11. *The conservation and integration of cultural heritage resources, including identified key public views can be achieved subject to the provisions of the Cultural Heritage Resources Section of this Plan.*

The site is not considered to be a cultural heritage resource.

### **Affordable Housing**

Section 7.2 of the OP provides policy direction with respect to affordable housing. The City recognizes the importance of housing, including affordable housing, in meeting the needs of the city's existing and future residents.

The City's Affordable Housing Strategy (AHS) sets an annual City-wide 30% target for housing that is affordable with the goal of ensuring that affordable housing is included in the range and mix of housing provided across the City. The goals and objectives of the AHS have also been incorporated into the Official Plan in Section 7.2 (Affordable Housing). These policies are intended to encourage and support the development of affordable housing throughout the city by planning for a range of housing types, forms, tenures and densities and have been applied to the review of this proposed residential development application.

The 32 new dwelling units would be considered affordable rental units based on their proposed size and subsidized rental rate, and they would be well below the 2020 affordable rental housing benchmark of \$1245 per month or less. As proposed, the 32 supportive housing units would contribute affordable and special needs housing. The individual units are proposed to be small subsidized rental apartment units which are provided together with support staff that allow the residents to live independently. The applicant is actively pursuing funding from the Canada Mortgage and Housing Corporation (CHMC) Rapid Housing Initiative.

The site is located in an area with nearby transit, a variety of retail and commercial services and recreational lands, providing the opportunity for an affordable lifestyle for future tenants.

### **Community Energy Initiative Update (2019) and Climate Change**

Section 4.7 of the Official Plan contains policies relating to energy management and the City's Community Energy Initiative (CEI). One of the areas of focus on the Community Energy Initiative is Building End-Use Efficiency. As the proposal is adaptively reusing an existing structure, this redevelopment would contribute to the CEI by introducing a new use to an existing structure, extending the use of the current building, reducing energy demand and greenhouse gas emissions compared with new construction. Through the site plan review process the applicant will be required to review the material changes needed to the building and detail any measures that can be taken to address the goals of the CEI as noted in Condition #6 in Attachment-2.

### **Review of the Proposed Zoning**

The applicant is proposing to rezone the property from the SC.1-11 (Specialized Service Commercial) to a specialized R.4A-?? (General Apartment) Zone. Instead of the standard apartment use permissions in the R.4A Zone, staff recommend including only the Supportive Housing use and the existing Hotel use. The Hotel use is requested in case the applicant cannot complete the proposed redevelopment, the site would be allowed to continue on as a motel in its current form.

The applicant originally requested that "social housing" and "special needs housing" also be added as uses to this zone, but through further review and discussion agree that the supportive housing definition meets the needs of the proposed use and these other proposed uses would not be needed.

The applicant also requested five specialized regulations to permit the supportive housing development as proposed. Three of these regulations are needed to accommodate the existing building's location on the site. A minimum front yard of 1.5 metres is based on the current front yard setback of the building, as is the exterior side yard of 4.9 metres and the proposed minimum rear yard of 6.3 metres. All of these special regulations recognize the existing site condition and do not create any impacts or compatibility issues.

A specialized regulation has also been requested to permit a maximum of 32 dwelling units on the site. Planning staff support the proposed regulation to limit the number of dwelling units to the current proposal. Staff have also recommended a regulation that limits the building height to the current one storey. By adding these regulations there is a clear understanding the proposed redevelopment is limited to the size and massing of the current building and further changes to the use or size would need to go through an additional public planning process.

On-site parking would also require a specialized regulation. The applicant has proposed a minimum of 13 parking spaces on site. In the standard apartment zones, 45 parking spaces would be required to accommodate parking for each



residential unit and potential visitors. For supportive housing the amount of parking needed has been determined to be far less.

In terms of parking use, it has been determined that at the most, likely five staff would be on site at a time, so the parking provided would accommodate staff need together with visitor parking. The applicant anticipates it would be unlikely for any resident to own a car, instead the majority of future residents are anticipated to use transit, bike or walk. The rest of the existing parking lot on site is proposed to be redeveloped into outdoor common amenity area for residents. Staff have reviewed the proposed parking arrangement and are satisfied that the amount of parking provided would accommodate anticipated staff and visitor needs, and if needed could accommodate some residents with vehicles.

### **Comments Received on the Application**

The Statutory Public Meeting for the proposed Zoning By-law Amendment was held on February 10, 2021. A number of questions and concerns were raised mainly related to compatibility of the proposed use, safety and how the site would be managed and operated as supportive housing.

### **Compatibility**

Compatibility was addressed earlier in this analysis through the review of the Official Plan policies above. However, concerns around compatibility were raised related to the existing demographic of the surrounding neighbourhood. The Zoning By-law regulates how the land is used but it does not and cannot regulate who uses the land, or in the case of a residential development, who the proposed owner or tenant will be.

Planning staff defer to the Ontario Human Rights Code (Section 2(1) which states that "Every person has a right to equal treatment with respect to the occupancy of accommodation without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability or the receipt of public assistance." Planners and municipalities have the responsibility to ensure their recommendations and decisions adhere to the Ontario Human Rights Code.

### **Safety**

Concerns were raised by members of the public that the redevelopment of the site as supportive housing would cause safety concerns and additional crime. As mentioned in the previous paragraph, planning staff will not address concerns based on tenancy that could discriminate against any group of people. From a planning perspective the only issue related to safety with this development proposal is security on the site itself for the future residents. As with other developments, if approved, at the time of Site Plan Review staff will review the proposal within the lens of Crime Prevention Through Environmental Design (CPTED) principles. CPTED is a multi-disciplinary approach to reviewing sites to identify design and architectural improvements that discourage crime and create a positive social environment. CPTED review makes recommendations regarding detailed site design

regarding aspects such as lighting, landscaping and establishing clear sightlines. Given the concerns raised to date, staff have identified that if approved, this site would go through CPTED review during the site plan review process to identify and address any areas of potential safety concern. A site plan condition (Condition#22) reflecting the need for a CPTED review is included in Attachment 2 of this report.