

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, including 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)]. As well as 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 36 bedrooms for supportive housing, 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 and services are available nearby.

As transitional housing, a type of 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 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 2041 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 transitional supportive housing units, a housing form that is proposed to be affordable and would 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 65 Delhi Street proposes 36 bedrooms of transitional supportive housing which would contribute to the range and mix of housing options in the City. The proposal is not considered typical affordable housing, but rather is special needs housing and addresses a specific need identified in the community which is identified as a goal within 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 housing 36 residents together with the portions 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

The Official Plan land use designations that apply to the subject site is predominantly "Low Density Residential" with a small part along the western edge of the site designated "Major Institutional". The "Low Density Residential" designation is meant for residential areas in the built-up area of the City that are predominantly low-density in character. "Major Institutional" recognizes and allows for large-scale institutional uses including the Guelph General Hospital.

The proposed redevelopment of 65 Delhi Street to supportive housing meets the requirements of the land use designation. The building is proposed to consist of 36 bedrooms together with shared living spaces for the residents and office space for support staff. The proposed use is considered to be special needs housing, because of the support space and staffing included in the supportive housing use, which is permitted in all residential designations and is permitted in the Major Institutional designation.

The Low Density Residential land use designation permits residential densities of 15 to 35 units per hectare, together with a maximum height of three storeys, though development proposals located along arterial or collector roads in this designation are permitted to be up to 100 units per hectare with a maximum height of six storeys. The site is accessed via Delhi Street which is a collector road, and is bound by Eramosa Road which is an arterial road, so the higher density permissions would be permitted.

The applicant is reusing the existing two storey building, but has proposed a maximum of 36 bedrooms for individual residents with shared kitchen and bath facilities within the building instead of standard dwelling units. The residential portion of the proposed development would not be measured in the typical density of housing units per hectare but rather limited to the 36 bedrooms and residents proposed. However for comparative purposes, 36 units on site would be a unit density of approximately 68 units per hectare, which is well within the 100 unit per hectare maximum density allowed within the designation.

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. The type of supportive house proposed, known as transitional supportive housing, is meant to be an interim type of housing providing support to residents generally for time periods that range from 3 months to 3 years.

The County of Wellington Housing Services Department provides the following description of transitional supportive housing:

Transitional housing with supports provides an intermediate step between emergency crisis shelter and permanent housing. Transitional housing with supports provides individuals with a safe place to stay temporarily along with a programme of individualized support services such as counselling, job training and placement, community activities,

and help with life skills. Facilities are targeted to those in need of structure, support and/or skill building, in order to move from homelessness to housing stability and ultimately prevent a return to homelessness.

Other recent examples of supportive housing proposed at 721 Woolwich Street and 85 Willow Road are considered permanent supportive housing, where residents are tenants for as long as they desire to live there. From a zoning perspective, both uses can be properly categorized as supportive housing, because the zoning by-law does not regulate the length of stay of residents in any category, only the use of the site itself.

Section 9.2.2 of the Official Plan 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 65 Delhi Street to develop transitional supportive housing addresses these considerations in the following ways:

- the site is meant to provide limited stay housing for people that experience chronic homelessness and need support to stay housed and live with independence;
- the site is located adjacent to the Guelph General Hospital campus, consisting of the hospital itself and several surrounding medical offices;
- the site is located along an arterial road near the Eramosa Road Mixed Use Corridor area, which allows the residents to be within walking distance of many retail and commercial services; and
- there is good access to public transit via both Delhi Street and Eramosa Road, recreation in adjacent City greenspace 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.

Staff have considered the proposed by-law amendment regulations together with the existing site layout in its surrounding context. The site is set back from the street and abuts the rear yards of several one and two storey houses that front onto Delhi Street, a personal service and medical office building at 55 Delhi Street and City owned greenspace. The applicant has proposed to maintain the current building with the addition of a ramp for better accessibility and the addition of fire stairs. There is adequate landscaped open space and outdoor amenity space available onsite for residents in the technical front yard which is the southerly yard, closest to Eramosa Road.

Criteria for Multi-Unit Residential Buildings and Intensification

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 intensification proposals.

The analysis below demonstrates how each of the eleven criteria are met for the proposed 36 bedroom 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 two storey building, which is primarily accessed from Delhi Street with technical frontage onto Eramosa Road. The site is adjacent to mainly two storey single detached dwellings that front onto Delhi Street and a two storey medical and personal service building at 55 Delhi Street.

The applicant is not proposing to alter the exterior of the existing building or the site layout beyond adding an accessibility ramp and fire escapes, as shown in the building elevations in Attachment 7. The building has heritage characteristics that will be maintained as do several of the neighbouring buildings.

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 located to the north and east of the site along Eramosa Road in the area that is a designated mixed use corridor. There is adjacent park space as

well as additional parks within walking distance along the river. Public transit is available nearby on both Delhi Street and Eramosa Road.

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 at most 15 staff would be on site at any time.

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

A single vehicular access is provided to the site via a private lane from Delhi Street. There is also plenty of parking on site, with a total of 41 spaces, some of which is expected to be used by employees or support staff and some is expected to continue to be used as hospital employee parking as per an existing agreement.

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 site is near transit, local retail and services and adequate on-site amenity area has been provided for residents as well as adjacent public greenspace.

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

There is no change in size proposed to the existing driveway or parking 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 not impact the street network. There may be an opportunity to improve connections for residents to the street, which is currently through a 4 metre wide right of way from the site to Delhi Street along the easterly side of 55 Delhi Street. Appropriate connectivity to the street network will be further reviewed through the site plan approval process.

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

No physical changes are being made to the existing site layout that would impact adjacent properties.

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 or natural 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 considered to be a cultural heritage resource and it will be recommended to be designated under Part IV of the Ontario Heritage Act.

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.

One of the action items recommended in the AHS is that that the City leverage any partnership opportunities with the County of Wellington and housing providers to help coordinate and increase the impact of the City's responses to affordable housing issues while recognizing legislative roles and service area boundaries. The County of Wellington is the designated Service Manager for the administration, funding and management of social housing and homelessness programs for both Wellington County and the City of Guelph.

The 36 bedrooms proposed would not be considered typical affordable rental units but as transitional supportive housing, they would provide a new type of special needs housing for Guelph that will help meet an identified housing gap.

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

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.

Review of the Proposed Zoning

Originally, the application proposed to change the zoning to a Specialized Infill Apartment Zone (R.4D-??) to permit the existing building to be renovated into a 36 bedroom transitional housing development or to permit an emergency shelter or daycare use on site.

Following the Statutory Public Meeting on May 10, 2021, the applicant revised their rezoning proposal to a Specialized Infill Apartment Zone (as proposed the R.4D-11(H)) to limit the use to supportive housing only. Planning and Zoning staff review of the proposed use determined that the proposed transitional housing use was more appropriately defined from a zoning perspective as supportive housing. Supportive housing is not a standard use in the Zoning By-law and has been added as the only site specific use to the proposed R.4D-11(H) Zone. The definition as proposed is shown in the recommended zoning in Attachment-2 of this report.

Specialized regulations are also needed to permit the conversion of the existing building in 36 bedroom supportive housing use and to recognize existing conditions related to building setbacks and parking location on site. A holding provision is also recommended to ensure that noise attenuation is considered prior to the zoning coming into effect.

In total, five specialized regulations are required to permit the supportive housing redevelopment as proposed. Four of this specialized regulations are needed to accommodate the existing building's location on the site.

The request for a minimum lot frontage of 12 metres is needed because the only lot frontage on a public street is the 12 metre wide portion of the site that fronts onto Eramosa Road. Similarly, the maximum front yard of 42 metres is based on the current front yard setback of the building, as measured from the technical front yard from Eramosa Road to the nearest building face. The minimum rear yard of 2 metres is an existing condition on the side of the building that fronts towards the private lane, abutting the neighbouring parking area. The requested regulation to allow 23 parking spaces in the front yard, where normally only landscaped open space is permitted, recognizes the existing parking spaces in the technical front yard. All of these special regulations recognize the existing site condition and cause no impacts or compatibility issues.

A specialized regulation has also been requested to permit a maximum of 36 bedrooms on the site in lieu of the standard unit per hectare density maximum of 100 units per hectare found in the standard R.4D zone. Planning staff support the proposed regulation to limit the number of bedrooms to the current proposal. As

noted earlier, if the density were measured as 36 units instead of bedrooms, the density would be approximately 68 units per hectare which is within the permitted range of this zone. By adding these regulations there is a clear understanding the proposed redevelopment is limited to the provision of bedrooms in the current building. Further changes to the use or unit type would need to go through an additional public planning process.

A specialized regulation has also been included to require a minimum of 15 parking spaces. The applicant anticipates that a minimum of 3 and maximum of 12 employees and/or support staff would be at the site at any one time and that no residents would have vehicles. Currently the site has 41 parking spaces and this is not expected to change, though there is an agreement in place with the hospital to provide 20 spaces for hospital employees that is expected to continue. Requiring a minimum of 15 spaces for the site ensures adequate parking for staff and visitors to the site.

A Holding provision has also been placed on the proposed zoning to ensure that a Noise Study is completed in accordance with the City's Noise Study Guidelines. This is a municipal requirement when a rezoning proposes to change to a sensitive land use, in this case residential, where the land abuts a potential source of noise.

Comments Received on the Application

The Statutory Public Meeting for the proposed Zoning By-law Amendment was held on May 10, 2021. A number of questions and concerns were raised mainly related to compatibility of the proposed uses, maintenance of onsite greenspace, safety and how the site would be managed and operated as supportive housing. The applicant responded to some of the concerns raised by removing the additional proposed emergency shelter and daycare uses and limiting the parking to what exists today. The applicant also provided additional information on the proposed operation of the site via a webpage (www.wellington.ca/65delhi) and additional discussion about the operation of the site at an online public information meeting held on June 29, 2021.

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#4) reflecting the need for a CPTED review is included in Attachment 2 of this report.