

Attachment-9 Planning Analysis

Provincial Policy Statement, 2020

The Provincial Policy Statement, 2020, came into effect on May 1, 2020. The Provincial Policy Statement (PPS) provides direction on matters of provincial interest related to land use planning and development. Part IV: Vision for Ontario's Land Use Planning System, includes that "efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities."

Most relevant to these applications, Policy Section 1.0 – Building Strong Healthy Communities speaks to 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 promotes creating and sustaining healthy, liveable and safe communities. This is achieved in part by promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term, and also by accommodating an appropriate affordable and market-based range and mix of residential types [1.1.1 a), b)]. Furthermore, promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs (1.1.1 e); and ensuring that necessary infrastructure and public service facilities are or will be available to meet current and projected needs. Also noted are promoting development and land use patterns that conserve biodiversity [1.1.1 h].

Section 1.1.3 (Settlement Areas) further states that "it is in the interest of all communities to use land and resources wisely, to promote efficient development patterns, protect resources, promote green spaces, ensure effective use of infrastructure and public service facilities and minimize unnecessary public expenditures." This sections also adds policies specific to supporting active transportation (1.1.3e) and transit-supportive, where transit is planned, exists or may be developed (1.1.f). Section 1.1.3.4 states that "appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety."

Section 1.4 focuses on housing development, 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. 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)].

Section 1.6.6 of the PPS outlines policies for planning for sewage, water and stormwater services. The proposed development will be on full municipal services and Engineering staff have confirmed that adequate capacity is available to fully service the proposed development [1.6.6.2] (See Engineering staff comments in Attachment-11).

Long-term economic prosperity is to be supported through several planning and development considerations. This includes promoting opportunities for economic development, encouraging residential uses that respond to dynamic market-based needs and provide necessary housing supply and a range of housing options for a diverse workforce [1.7.1 a), b)].

Development must also consider energy conservation, air quality and climate change. This is to be supported through land use and development patterns that promote a compact built form and a structure of nodes and corridors. Vegetation is also to be maximized within settlement areas [1.8 g)].

This proposal to redevelop and intensify the subject site within the City's settlement area from the existing single storey commercial plaza to two mixed-use buildings with commercial units on the ground floor is consistent with the PPS. The mixed-use development adds to the range and choice of housing options in an area, while maintaining the ground floor commercial space to support liveable communities. The proposed development is compatible with the surrounding residential neighbourhood and will allow the efficient use of land, infrastructure and public service facilities.

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

The Growth Plan for the Greater Golden Horseshoe, 2019 (Growth Plan) is issued under the Places to Grow Act (2005) and builds on the PPS. It was enacted by the province to support the creation of complete communities, manage forecasted population and employment growth to the year 2051, protect the natural environment, and support economic prosperity.

The current Growth Plan came into effect on May 16, 2019 and was amended (first amendment) on August 28, 2020. It applies to any decisions on planning matters made on or after this date. The Growth Plan builds on other provincial initiatives and policies and provides a framework to manage and guide decisions on growth through building compact, vibrant and complete communities. All decisions affecting planning matters, including new development, must conform with the Growth Plan.

The policies of the Growth Plan focus on the key themes of building complete communities; directing a significant share of new growth to delineated built-up areas to meet population and employment targets and densities; promoting the development of transit-supportive densities; and creating a healthy mix of residential and employment land uses. Overall, the vision is for urban centres to be

characterized by more compact development patterns that support climate change mitigation and adaptation as well as providing a diversity of opportunities for living, working and enjoying culture.

Policies 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 'Settlement Areas', specifically the 'Delineated Built-up Areas' of the city such as the subject lands. These sections contain policies related to intensification, creating complete communities as well as optimizing and making efficient use of infrastructure and public service facilities.

The subject lands are within the city of Guelph settlement area and are designated in the City's Official Plan for urban development. As per policy 2.2.1.2 c) of the Growth Plan, growth within settlement areas shall be focused in delineated built-up areas. The subject lands are located within the city's "Built-Up Area" as shown on Schedule 1B: Growth Plan Elements of the Official Plan. As per Policy 2.2.2.2 of the Growth Plan (and by extension Policy 2.4.5.1 a) of the Official Plan), a minimum 40 per cent of new residential development in the city must occur each year within the Delineated Built-Up Area. The Growth Plan will eventually increase the required proportion of growth within built up areas to 50 per cent of all development from the completion of the City's Municipal Comprehensive Review (MCR) [2.2.2.1 a)]. As per policy 2.2.5.1 of the Growth Plan, economic development should be promoted through the effective use of underutilized employment land, by promoting mixed development where possible, and through proper connect to transit.

The proposed development conforms to the policies of these sections by:

- 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 to the neighbourhood 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, which include the following policies:

- Policy 2.2.6.1 supports housing choice 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.
- Policy 2.2.6.3 states that to “support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.”

Overall, the mixed-use development proposal represents a more compact and efficient form of development. The proposal will be served by adequate infrastructure and public facilities and provide employment and commercial services to the immediate built-up neighbourhood. The development will contribute to the overall intensification target of the City’s built-up area, adding 115 apartments or a density of 114 units per hectare, focused on smaller dwelling unit sizes to meet an identified housing need, and make efficient use of existing commercial services, infrastructure and public service facilities.

Based on the above summary of policies, 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 subject site is designated Neighbourhood Commercial in the Official Plan. The predominant use of land within this designation is intended to be convenience and neighbourhood commercial uses within walking distance to residential areas. Multiple unit residential development is permitted in this designation within mixed use buildings. The maximum permitted height is six storeys. Planning staff note that the proposed development application was received prior to the approval of the Commercial Policy Review and therefore relies on the previous commercial policies as set out in the previous March 2018 Consolidation of the Official Plan.

The proposed development contributes to the strategic goals of the Official Plan, specifically related to planning for a complete and healthy community by developing an appropriate range and mix of local services and housing to contribute to meeting the city’s current and projected need. The subject lands are also located with the delineated Built-up Area of the city, which are identified in Section 3.7 of the Official Plan for intensification. This development maintains a mix of commercial and service amenities on the site for the use of the surrounding neighbourhood while intensifying by adding 115 apartment units.

The proposed development also addresses the urban design policies related to built form in Section 8.6 of the Official Plan by locating buildings close to the street, ensuring that principal entrances of commercial units in the mixed-use buildings are oriented towards the street and that the site is well-connected with walkways for safe circulation and access by pedestrians.

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 six storey mixed use buildings.

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

The subject site is an existing 1 storey commercial plaza, and the surrounding area is a mix of low to high density residential uses, mostly apartment buildings between two and seven storeys, with a mix of building setbacks and sizes.

The proposed mixed-use buildings at six storeys in height fit into the surrounding context in terms of height and use. The first building is sited along Willow Road close to the intersection of Dawson Road, in keeping with the standard zoning setback of six metres and oriented along Willow Road. The second building is parallel, but setback further on the site and sides onto Dawson Road, also with a 6 metres setback from the street.

The development as proposed is compatible with the character of the surrounding neighbourhood given its height, mixed use format and building placement on site, while contributing to the diversity of building types found in the area.

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.

The site is already a commercial plaza and replacing some of the existing plaza with new ground floor commercial units will continue to provide local services to surrounding residents and new residents of the proposed apartment units. A range of services currently exist on site that are proposed to be retained in their current location or moved into the new commercial space in the mixed-use buildings.

Other retail uses and commercial services are available nearby. A hardware store (Rona) is located to the northeast on Dawson Road and a larger commercial area with a grocery store is located just under 1 km away or

about a 12-minute walk, near the intersection of Willow Road and Silvercreek Parkway. The site is also near transit stops for the Willow West and Northwest Industrial bus routes, accessed via Willow Road.

The site is near the Shelldale Centre, a community hub with a variety of neighbourhood and social services. Norm Jary Park is a large park adjacent and to the north of the Shelldale Centre. It is also within walking distance to the Willowdale Childcare Centre, Willow Road Public School and Our Lady of Lourdes Secondary School.

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

Traffic staff have reviewed the proposal and its submitted Traffic Impact Study and determined that there will be no unacceptable impact on the planned function of adjacent roads and intersections from the proposed redevelopment of the site and the addition of 115 apartment units.

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

Vehicular access is provided to the site from two driveways off Dawson Road and one off Willow Road. Consideration has been given to providing adequate vehicle circulation on site, including ensuring space for garbage trucks and loading for the commercial uses.

The site will provide a total of 228 parking spaces; the total required by the Zoning By-law is 212 parking spaces, 97 spaces are provided for commercial uses and 131 spaces are provided for the apartment units. Of the total parking spaces, 128 will be provided in one underground parking level. Access to the underground parking is provided behind the first six storey building adjacent to Willow Road.

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

Engineering staff are satisfied that adequate water and wastewater servicing capacity is available for the proposed development. Engineering staff have reviewed the proposal and are satisfied with the proposed on-site servicing plan. The site itself will provide commercial services and adequate on-site amenity area has been provided for the future residents via both interior and rooftop amenity areas.

7. Surface parking and driveways shall be minimized.

The site has an efficient layout, with surface parking intended predominantly for the commercial users of the site and underground parking for the majority of resident parking. Driveways are suitably laid out to ensure efficient vehicular circulation on site.

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.

No new public streets or vehicular connections are proposed on the site, given its location at an intersection and relatively small size. Additional pedestrian connections to the site are being added along the new building closest to Willow Road, with commercial entrances facing the street and from the new building to the north to connect to Dawson Road.

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

There are no impacts anticipated to adjacent properties related to the grading, drainage and servicing of this site, nor of microclimatic conditions at the proposed six storey buildings.

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 of the site does not impact public safety, identified 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.

There are no nearby cultural heritage resources identified that could be impacted by the proposed development.

Community Energy Initiative Update (2019) and Climate Change

Section 4.7 of the Official Plan contains policies on Community Energy. Policy 4.7.4.1 of the Official Plan indicates that the City will utilize the development approvals process, such as site plan control, to ensure that new residential development includes sustainable design features.

The applicant has indicated to Planning staff that they will be including a number of energy efficiency measures within the proposed new mixed-use buildings, consistent with the City's Community Energy Initiative (CEI) 2019 update. These initiatives proposed by the applicant will contribute to the City meeting its goal to become a net zero community by 2050. A summary is included Attachment 10.

Staff are recommending a condition to be implemented at site plan review that the applicant shall provide a commitment to incorporate the proposed features into the development that will contribute to meeting the action items from the CEI (see condition #36 in Attachment 3). Specifically, the applicant will need to consider how

they will contribute to CEI Action 1, which is to incrementally increase the number of net zero homes to 100% by 2031.

Affordable Housing

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 for all households 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 2021 affordable housing ownership benchmark rental price is \$1295 per month. Rental rates have not yet been determined for the proposed development and it is not known yet whether the smaller units on site would contribute directly to the supply of affordable housing. However, the overall addition of rental apartment units will contribute to rental housing supply and a need for more smaller and one-bedroom units was identified in the City's Affordable Housing Strategy. The site is located in an area near transit and near services, providing the opportunity for an affordable lifestyle for future tenants.

Staff note that the proposed Zoning By-law Amendment are to allow the development of apartment units, but the actual contribution to housing affordability can only be measured as the units are sold. Zoning provisions cannot be used to ensure the units are affordable or to control the tenure of the units.

Review of the Proposed Zoning

The applicant is proposing to rezone the property from the standard CC (Commercial Shopping Centre) Zone to a specialized CC-31 (Community Shopping Centre) Zone. The applicant has requested one specialized regulation to allow the maximum height to be six storeys, to permit the development as proposed. Planning staff have also recommended regulations related to providing minimum amounts of commercial space and common amenity area to better confirm the planned function of the site.

Building Height

Planning staff have no concerns with the proposed building height of six storeys for the two new mixed-use buildings. The Official Plan does permit up to six storeys in this designation. The applicant completed shadow and wind studies to determine that no adverse physical impacts would occur from the proposed development and the surrounding residential uses range from two to seven storeys in height, so it would be similar and compatible with surrounding building sizes.

Minimum Commercial Gross Floor Area

Planning staff recommend adding a regulation to require that a minimum amount of commercial Gross Floor Area (GFA) of 1700 square metres be provided. There is

currently no minimum amount of commercial space required in the standard CC zoning regulations. The applicant is proposing to provide 1748 square metres of commercial GFA in total on the site and requiring a minimum of 1700 metres, will ensure that the intended commercial function of the site is maintained.

Minimum Common Amenity Area

Originally the applicant proposed to provide a common amenity space in the northwest corner of the site, together with some interior amenity area. The standard CC zone does not have any requirement for amenity area. The applicant revised their buildings and reduced the total number of residential units by 15 but increased the amount of interior common amenity area and added rooftop amenity area intended to provide for community gardens on both new buildings. Planning staff recommend adding a regulation requiring 18 square metres of common amenity area per dwelling unit to ensure that the proposed amenity areas are incorporated into the redevelopment of the site.

Comments Received on the Applications

The Statutory Public Meeting for the proposed Official Plan and Zoning By-law Amendment was held on January 27, 2020. Questions were raised related to dwelling unit sizes, traffic, parking, amenity area and the loss of commercial tenants. Most of these issues have been already addressed above.

Unit sizes

A request was made to consider the development of 3-to-4-bedroom apartment units for families. The applicant considered this request but given the demand for smaller apartment units has proposed 75 1-bedroom units and 40 2-bedroom units. The Zoning By-law does not control the number of bedrooms in an apartment unit but planning staff support the intent for small units, as they are an identified need in the City's Affordable Housing Strategy.

Loss of Commercial Services

A concern was raised that commercial tenants, that area residents depend on, would be lost in the redevelopment of the site. The development is planned to be phased so that commercial tenants will not be lost. The existing retained portion of the plaza will be able to continue to operate throughout the redevelopment. The owner has proposed to phase development, by first constructing the building closest to Willow Road, then moving commercial tenants from the north portion of the existing plaza into the new building, before demolishing this portion the existing plaza and building the second building. A large portion of the north plaza that is proposed to be demolished is vacant currently so there is enough space for existing tenants to continue to operate with this approach.