

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)]. The proposed development will provide a different form of housing in the area with the proposed suites and apartments meant for university students.

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).

Section 1.6.7 promotes a land use pattern, density and mix of uses that minimize the length and number of vehicle trips and that support current and future use of transit and active transportation. [1.6.7]. The proximity of the site to transit services on both Stone Road and Scottsdale Drive provides access to the broader area. Future residents will have many nearby amenities and commercial services that can be accessed without use of a vehicle, further reducing impacts on the surrounding road network.

The proposal is consistent with the PPS, redeveloping and intensifying the subject site within the City's settlement area from the existing hotel to a residence, adds to the range and choice of housing options in an area with many local services and amenities. The proposed development is compatible with the surrounding uses 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)].

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 proposed redevelopment will be served by adequate infrastructure, public facilities and commercial services in the surrounding neighbourhood. The development will contribute to the overall intensification target of the City's built-up area, adding 13 apartments and 151 suites, and makes 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 Official Plan land use designation that applies to the subject lands is "Mixed-Use Corridor" (as shown in Attachment-4). The Mixed-Use Corridor designation allows for a variety of commercial, institutional, and medium to high density residential uses. A maximum height of six storeys and a maximum residential density of 150 units per hectare are permitted in this designation.

The proposed development contributes to the strategic goals of the Official Plan, specifically related to planning for a complete and healthy community by contributing to developing an appropriate range and mix of housing types to meet the City's current and projected needs. 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.

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 building conversion from hotel to 13 apartments and 151 suites.

- 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 converting an existing four storey commercial hotel building into residential use. The surrounding area is a mix of commercial uses, including the Stone Road Mall across Scottsdale and residential uses, including 3 storey high townhouses on Janefield Avenue and a vacant high density apartment site anticipated to be 10 storeys high on Janefield Avenue to the west of this site. The existing building at four storeys in height fits into the surrounding context in terms of height and use.

The development as proposed is compatible with the character of the surrounding neighbourhood given its height, setback 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 within the Stone Road Mixed Use Corridor which provides a wide variety of local and regional retail and commercial service options for future residents within walking distance. The site is also near W.E. Hamilton Park, located at the intersection of Scottsdale Drive and Janefield Avenue, which contains trails that extend to the north.

The site is also near several transit stops and routes. The closest stop is on Stone Road near the intersection of Stone Road and Scottsdale Drive and is part of the University/College, Edinburgh/College and Woodlawn/Watson bus routes. The site is also in walking distance to bus stops south on Scottsdale, at Janefield and Scottsdale and to the back of the Stone Road Mall along Scottsdale, which provides additional bus route options to get to the University and Downtown.

- 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 determined that there will be no unacceptable impact on the planned function of adjacent roads and intersections from the proposed conversion of the site to a residential use.

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

Vehicular access is provided to the site via the northerly existing driveway off Scottsdale Drive, the southerly access closest to the intersection of Scottsdale Drive and Stone Road is proposed to be closed. Consideration has been given to providing adequate vehicle circulation on site, including ensuring space for garbage trucks and loading.

The site provides a total of 210 parking spaces which meets the standard zoning requirements for apartments based on the proposed suites being considered dwelling units, however, staff have proposed a reduced

requirement of one parking space per unit or suite, plus 0.1 parking spaces per unit for visitors to recognize the likely reduction in parking demand given the majority of the units are one bedroom suites and the availability of transit and walkable services.

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 on-site servicing. The site itself will provide adequate on-site amenity area for future residents via both interior and exterior amenity areas.

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

The site in its existing layout contains a total of 261 parking spaces, which is more than is required by the zoning and anticipated to be needed by the future residents. Therefore, the applicant has proposed to remove some of the surface parking and replace it with greenspace, while still maintaining a total of 210 parking spaces on site. Driveways are being maintained and 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 near an intersection and relatively small size. Pedestrian and cycling connections exist and will be further considered through the site plan review 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.*

There are no impacts anticipated to adjacent properties related to the grading, drainage and servicing of this site, nor of microclimatic conditions at the existing four 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 when converting the building to residential use, 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.

There are environmental benefits of retrofitting the building versus demolition and complete redevelopment. The applicant has also proposed to upgrade to high efficiency windows, lighting fixtures, plumbing fixtures and heating and ventilation systems. The applicant also proposes to remove excess parking and replace it with planted areas and provide EV ready parking spaces and carshare parking spaces.

Staff are recommending a condition to be implemented at site plan review that the applicant shall provide a commitment to incorporate these 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 units will

contribute a new housing form to rental housing supply in the area. The site is well-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 rented. Zoning provisions cannot be used to ensure units are affordable or to control the tenure.

Review of the Proposed Zoning

The applicant is proposing to amend the existing SC.1-40 zone to permit the apartment building and residential suites uses for the proposed conversion of the site from the hotel use. Specialized regulations are also required so the proposed suites are treated as dwelling units in terms of density and parking for the site.

A concern was raised at the Council meeting about the original proposed use "student residence" and that it could be considered people zoning instead of land use zoning. The applicant worked with staff and a definition for "Residential Suites" was created that better accommodates the proposed suites as a use. A definition other than apartment building is needed given that the suites, which generally consist of a bedroom and a washroom, are not defined as dwelling units because they do not contain kitchen facilities. Staff are satisfied that the proposed definition is appropriate for the use.

Density and Parking

Similar specialized regulations are needed to be able to consider the suites to be counted the same as dwelling units for the purpose of determining density and parking requirements. A maximum density of 150 units per hectare is proposed, consistent with the High Density Apartment Zone (the R.4B Zone).

The applicant proposed a ratio of 1 parking space for every 2 suites but concern was raised that the proposed parking rate would be too low. Staff recommend that parking be provided at a minimum rate of 1 parking space per unit and 0.1 visitor spaces per unit. Staff have no concern with this proposed specialized regulation given the lower number of people per unit on site, with suites designed for one person per unit, the location with several available transit routes nearby and many walkable services. Staff also note that the applicant intends to reduce the number of parking spaces on site from 261 parking spaces to approximately 210 parking spaces on site, which would meet with standard apartment parking regulation requirements. Those parking spaces proposed to be removed are proposed to be replaced by greenspace, subject to site plan review.

Minimum Common Amenity Area

Planning staff recommend a regulation to require common amenity area for the proposed residential use of the site. The applicant is proposed to provide approximately 1480 square metres of amenity area on the site, located both within the building and through a patio on the north side of the building. To provide some

flexibility, staff propose a minimum of 1300 square metres of common amenity area be provided on the site.

Comments Received on the Applications

The Statutory Public Meeting for the proposed Official Plan and Zoning By-law Amendment was held on December 13, 2021. Questions were raised related to zoning use, parking, bicycle provisions, loss of hotel rooms, and the proposed design of the building's exterior. Some of these issues have been already addressed above.

Loss of Hotel Rooms

A concern was raised at the public meeting that the loss of the hotel use could impact the City's tourism industry in light of other recent or expected hotel conversions. Staff from Economic Development and Tourism have reviewed the application and while concerned about the overall loss of hotel rooms, have no objection to the proposed conversion. They also noted they will continue to monitor the impact on visitors and tourism in the City and that in the short term, other existing hotels will benefit from the increased demand for their services.

Proposed Building Design

A concern was raised about the proposed brightly coloured mural on the outside of the building cladding and fit with the surrounding area. The applicant revised their building elevations to show a more neutral colour scheme which will be further considered at the time of site plan review.

Accessible Units

A question was raised about whether there would be accessible units. The applicant is still finalizing their building drawings, but some accessible units are anticipated and will be confirmed through the site plan review process.

Bicycle Parking

A concern was raised about the adequacy and types of bicycle parking being provided on site. Staff in Transportation Demand Management have identified opportunities for additional bicycle parking on site and will work with the applicant through the Site Plan Review process.

Impact of student housing

A question was raised about the impacts of adding a student housing building on the surrounding area. Planning staff have identified no concerns with the proposed conversion of the site, noting it is a good location for residents, being in proximity to plenty of retail and service options as well as frequent transit.

Could this site be supportive housing

A question was raised about whether the site could specifically accommodate supportive housing. The site, which has a specialized Service Commercial Zone does not permit supportive housing. Supportive housing is not a permitted use in any zone in the Zoning By-law, but a specialized definition that has been applied on a site-specific basis. Staff note that through the Comprehensive Zoning By-law, the

site will likely be rezoned to a new Mixed-Use Zone, permitting a wider range of uses in keeping with the Official Plan designation for the site. Outside of the Comprehensive Zoning By-law, a further review of special needs housing, including supportive housing, is expected that will make recommendations on the which zoning categories are best suited for the supportive housing use.

Waste Collection

A question was raised regarding municipal waste collection. At this time the applicant has proposed private waste collection but will consider public waste collection through the site plan review process.