

## **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 advises 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 of stacked townhouses on this site will provide a different form of housing in the area.

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 recommended a holding provision for a needed sanitary upgrade downstream to ensure that adequate capacity will be 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 service on Woolwich Street provides access to the broader area. Future residents will have access to nearby amenities and commercial services along Woolwich Street and at the larger commercial node at Woodlawn Road and Woolwich Street that can be accessed without use of a vehicle, further reducing impacts on the surrounding road network.

The proposal is consistent with the PPS, intensifying the subject site within the city's settlement area from the existing single retail store to 96 stacked townhouse units, adds to the range and choice of housing options in an area with 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 development 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 development 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 relevant to the proposed development of 96 stacked townhouse units:

- 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 development will contribute to the intensification target of the City’s built-up area, adding 96 stacked townhouse units, 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 Office Commercial” (as shown in Attachment-4). This designation allows for a variety of freestanding, small-scale commercial, office, residential or mixed-use buildings. A maximum height of four storeys and a maximum residential density of 100 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 uses and 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, and which helps provide for urban growth and land use patterns that ensure efficient use of land and municipal infrastructure (2.2.1.c).

### **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 development of 96 stacked townhouses.

- 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 of 96 stacked townhouses in the westerly half of the site together with a one-storey retail commercial building along the street is compatible with surrounding uses. The surrounding area contains a mix of uses, including one-storey commercial uses to the south of site and the Woodlawn Memorial Cemetery to the north. Directly across Woolwich Street is Riverside Park, with townhouses along Marilyn Drive to the northeast and 3 storey apartments to the southeast along Woolwich Street. To the rear of the site, across the Guelph Junction Railway, is Bailey Park. The proposed stack

townhouse buildings 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 located near the mixed use node at Woodlawn and Woolwich which provides a variety of local and regional retail commercial options for future residents within walking distance. To the south of the site along Woolwich are a variety of smaller commercial service, retail and restaurant uses. The site is also on the mainline transit route that runs from the Woodlawn/Woolwich Commercial node down to the Clair/Gordon Commercial Node.

The site is directly across from Riverside Park, which contains trails that extend to the north and south. A trail is also planned along the Guelph Junction Railway behind the site and consideration has been made in the site design for a future pedestrian connection.

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 development of the 96 stacked townhouses.

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

Vehicular access is provided to both the commercial and residential portions of the site from one shared driveways on the southerly portion of the site off Woolwich Street. Consideration has been given to providing adequate vehicle

circulation on site, including ensuring space for garbage trucks and loading for the commercial component of the site.

The residential portion of the site provides a total of 117 parking spaces which meets the standard zoning requirements for townhouses and the commercial portion of the site meets the parking requirements for retail uses.

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

Engineering staff have identified that planned municipal service upgrades are required before adequate wastewater servicing capacity is available for the proposed development. Engineering staff have recommended that an "H" or holding provision is placed on the zoning until this upgrade is completed.

The site itself will provide adequate on-site common amenity area for future residents and private amenity areas via balconies and patios. Riverside Park is also available across Woolwich Street for recreational use.

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

The site in its existing layout contains a total of 117 surface parking spaces for the residential lands, which is in line with the zoning requirements and anticipated to be needed by the future residents. One driveway entrance has been removed along Woolwich Street from the original configuration of the Beer Store site and the existing one driveway is 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 and relatively small size. Pedestrian and cycling connections have been provided to Woolwich Street and will be further considered through the site plan review process. The anticipated development of a trail on the Guelph Junction Railway is another opportunity for future pedestrian and cycling connections for this site.

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 from the proposed 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 impacts to cultural heritage resources by the proposed development. Staff have added a zoning regulation identifying that the buildings must be setback a minimum of six metres from the cemetery lands to the north to ensure adequate buffer space.

#### *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 constructing the proposed stacked townhouses, 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.

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 #34 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 developer has not confirmed yet whether the proposed units will be rental or ownership. However, the overall addition of some smaller stacked townhouse units will contribute a new 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 stacked townhouse units, but the actual contribution to housing affordability can only be measured as the units are sold or rented. Zoning provisions cannot be used to ensure units are affordable or to control the tenure.

## **Review of the Proposed Zoning**

The applicant proposed to amend the SC.1-28 Zone by adding more uses to the site and specialized regulations for the proposed stacked townhouses. Staff have recommended a new SC.1-57 Zone because the specialized regulations and the need for a Holding Provision would not apply to other properties that also have the SC.1-28 zoning. The new SC.1-57 Zone would apply only to the property at 710 Woolwich Street.

### *Proposed Uses*

The applicant originally proposed the following uses be added to the SC.1-28 Zone:

- Stacked Townhouses
- Multiple Attached Dwellings
- Apartments
- Convenience Retail
- Drug Stores / Pharmacies
- Medical Offices
- Medical Clinics
- Optical Dispensary
- Laundry and Dry Cleaning Facilities
- Office
- Personal Service Establishment; and,
- Retail Establishment

Staff recommend a shorter list, given the anticipated changes in the upcoming Comprehensive Zoning By-law, which will consolidate many retail and service uses together and eliminate the need for separate uses that are not currently proposed on site. Staff recommend the following uses be permitted on the subject site, in addition to those already permitted, as shown in Attachment-5:

- Apartment Building, in accordance with Section 5.4.1.1 of the By-law
- Townhouse, in accordance with Section 5.3.1.1 of the By-law
- Stacked Townhouse, in accordance with Section 5.3.1.1 of the By-law
- Convenience Store
- Medical Office
- Medical Clinic



- Office
- Personal Service Establishment
- Retail Establishment

Staff are satisfied that these uses are appropriate for the site, in keeping with the existing Mixed Office Commercial Official Plan designation and in line with the uses anticipated in the Comprehensive Zoning By-law.

#### *Off-Street Parking Location*

The surface parking area for Stacked Townhouses shall be set back a minimum of 1.5m of the property line. The standard regulations require that parking be setback a minimum of 3 metres from the property line. Planning staff have no concern with the proposed reduction to 1.5 metres because the property will be fenced and the reduced setback will not impact neighbouring properties.

#### *Minimum Private Amenity Area*

Originally, the applicant did not provide private amenity areas and instead focused on providing a consolidated common amenity area for future residents. Council did raise some concerns with respect to this approach at the Public Meeting. In response, the applicant revised their building concepts to accommodate some private amenity area for each unit.

The applicant has proposed that for stacked townhouses, a minimum of 5.0 m<sup>2</sup> of Private Amenity Area shall be provided for each above grade unit and a minimum of 8 m<sup>2</sup> shall be provided for each below grade unit. Staff are satisfied with the proposed private amenity areas that result in small balconies or patios for each unit depending on location, in addition to the common amenity area also provided on site.

#### *Minimum Side Yard Setback*

Originally the applicant proposed a minimum 5 metre setback from both interior side yards of the site. Concern was raised about the setback of the building from the cemetery and providing adequate buffer. The applicant shifted their proposed buildings and have now provided a 4.5 metre setback from the southerly property line and a 6-metre buffer from the northerly property line, against the cemetery. Planning staff have no objection to the proposed setbacks.

#### *Maximum Density*

The applicant has proposed a maximum density of 100 units per hectare shall be for Stacked Townhouses. The standard zoning regulations require a maximum density of 60 units per hectare, with up to 75 units per hectare permitted with underground parking. The proposed 96 townhouses would be at a density of 85 units per hectare. The increase in density is because the Zoning By-law generally contemplates stacked townhouses to be one unit on top of another, whereas this proposed stacked townhouse is actually three units high, consisting of a lower, partially below grade unit, a main floor unit, and upper, 2 storey high units, which increases the density. Planning staff are supportive of the additional density proposed on the site, which provides a new unit type to the area that is an efficient use of land and is compatible with surrounding uses.

### *Maximum Building Height*

The applicant has requested a maximum building height of 4 storeys. The proposed stacked townhouses are four storeys in height and in keeping with the maximum height in the Official Plan, so planning staff have no concern with the proposed regulation.

### *Severability Provision*

The applicant has requested a specialized regulation to allow the site to be treated as a whole from a zoning regulation perspective, whether or not it is severed in the future. The applicant has requested this regulation, known as the severability provision, because they have not yet determined whether the site will remain as is, with rental townhouse units, or severed and condominium townhouse created. Planning staff have no objection to the proposed additional regulation which has been used previously on other similar sites.

### *Holding Provision*

Engineering staff have identified the need for a holding provision to ensure that necessary municipal services are adequate and available to service the site. A sanitary service upgrade has been identified as a need in order to ensure adequate sanitary service for the site. The upgrade is planned and anticipated in the near future. The developer will be able to apply to lift the Holding Provision and proceed with the development once this condition has been satisfied.

## **Comments Received on the Applications**

The Statutory Public Meeting for the proposed Zoning By-law Amendment was held on September 13, 2021. Questions were raised related to private and common amenity area, pedestrian connections, accessible units, site energy efficiency, trees along the cemetery and waste collection. Some of these issues have been already addressed above.

### *Pedestrian Connections*

A question was raised about the potential to connect the site to nearby greenspaces or the property to the south. As noted earlier, there is an opportunity expected in the future, to connected the rear of the site to an expanded future trail along the Guelph Junction Railway. The applicant is aware of the anticipated trail and is willing to provide for a connection in the future. The applicant has also proposed sidewalks to the street to ensure good connectivity with the local services and access to Riverside Park across the street. The site immediately to the south is currently vacant, so at this time there is no opportunity to provide this connection, though consideration could be made in the future if it was warranted.

### *Accessible Units*

A question was also raised about whether there any accessible units proposed. The applicant has reviewed their proposed design, but the stacked townhouses will not have any accessible units. The design of stacked townhouses generally requires stairs to access all units, so they are usually not able to provide accessible units.

### *Waste Collection*

At this time, private waste collection is proposed for the site. Through the site plan review process, the applicant will have the opportunity to further discuss the opportunities for public or private waste collection for the site.

### *Trees along the Cemetery*

A concern was raised about reduced setbacks impacting trees along the cemetery or north side yard of the proposed site. Staff have reviewed the proposed zoning and recommend that a minimum 6 metre wide side yard be imposed to ensure that there is adequate space for trees along this side yard and no impact to existing trees in the cemetery. Proposed site plan condition #2 in Attachment-3 requires the applicant to consult with the cemetery representatives and the City's landscape planner to ensure proper tree protection measures are in place.