

## **Attachment 1- Planning Analysis**

# **MEMORANDUM**

**To: Katie Nasswetter, Senior Development Planner, City of Guelph  
Chris DeVriendt, Manager Development Planning, City of Guelph**

**From: Nick McDonald, President, Meridian Planning Consultants  
Brad Wright, Senior Planner, Meridian Planning Consultants**

**Date: August 24, 2022**

**Re: Professional Planning Opinion  
785 Gordon Street  
Proposed Official Plan Amendment and Zoning By-law Amendment**

**File: OZS22-005  
Ward 5**

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### **Purpose of Memorandum**

Meridian Planning Consultants (MPC) was retained by the City of Guelph to provide a professional planning opinion on a proposed Official Plan Amendment and Zoning By-law Amendment for lands municipally known as 785 Gordon Street ('the Subject Lands'). Based on a review of the current proposal, it is recommended that the applications be refused for reasons provided in this report.

### **1.0 Background**

Applications for an Official Plan Amendment and a Zoning By-law amendment have been received for the property municipally known as 785 Gordon Street from GSP Group Inc. on behalf of the property owner, 2371633 Ontario Inc. The applications were received by the City on March 29, 2022 and were deemed to be complete on April 28, 2022.

The applicant has proposed to redevelop the site by demolishing the existing hotel building and developing a 10-storey mixed use building. The applicant proposes 389 “Post-Secondary School Residence Units” consisting of a total of 520 bedrooms, together with 587 square metres of convenience commercial uses on the main floor of the building. The site is proposed to be accessed off Harvard Road. A total of 220 parking spaces are proposed, consisting of 45 surface parking spaces and 175 underground parking spaces.

### 1.1 Location

The Subject Lands are approximately 0.85 hectares in size and located on the southwest corner of the intersection of Gordon Street and Harvard Road. The site currently contains a two-storey hotel with a peaked roof, known as the Days Inn. The figure below illustrates the location of the Subject Lands.



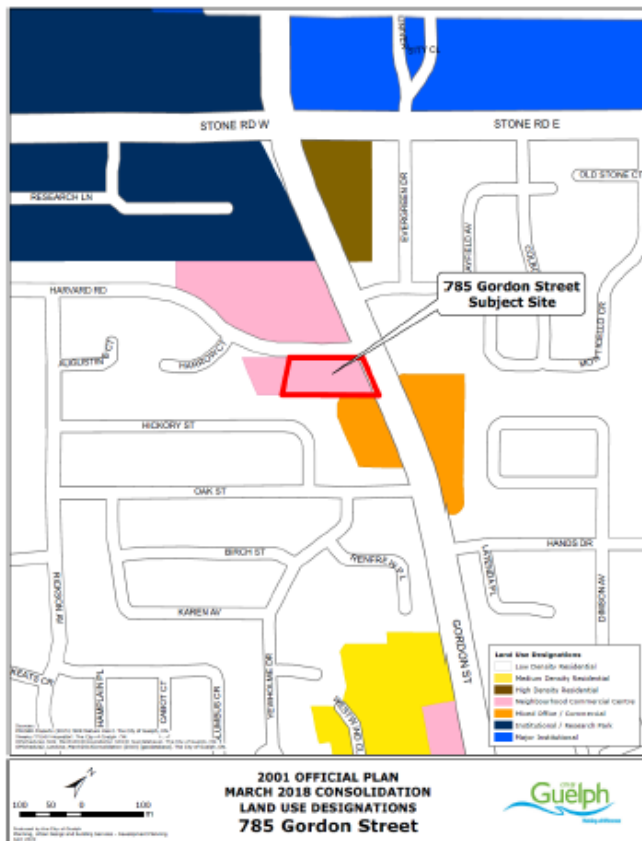
Surrounding land uses include:

- *To the north, across Harvard Road, is the Campus Estates Plaza, a neighborhood commercial area that contains a variety of uses including retail, restaurant, medical office and personal service uses;*
- *To the east, across Gordon Street, are two-storey townhouses and to the south of the townhouses is a two-storey office building;*

- To the south of the site is a three storey townhouse building that fronts onto Gordon Street;
- To the southwest, the Subject Lands back onto single detached dwellings that front onto Hickory Street; and
- To the west is a two-storey office building that fronts onto Harvard Road.

## 1.2 Existing Official Plan Land Use Designations and Policies

The Official Plan land use designation that applies to the Subject Lands is Neighbourhood Commercial Centre. The Neighbourhood Commercial Centre designation is intended to accommodate local convenience and neighbourhood commercial uses within walking distance of residential areas. Permitted Uses in a Neighbourhood Commercial Centre include commercial, retail and service uses, small-scale offices, community services, live/work units, multiple units residential within mixed-use buildings and urban squares. The maximum height in this designation is six storeys and the maximum permitted net density for residential development is 100 units per hectare. The figure below illustrates current Official Plan land use designations for 785 Gordon Street and surrounding areas.



### 1.3 Proposed Official Plan Amendment

The applicant is requesting that the site be redesignated as High Density Residential with site specific policies to permit a maximum density of 615 bedrooms per hectare and to allow convenience commercial uses that have a maximum gross floor area of 600 square metres. The standard High Density Residential designation would allow a maximum of 10 storeys in height, a maximum net density of 150 units per hectare, and a maximum of 400 square metres of convenience commercial uses, with the latter being permitted in all Residential land use designations.

### 1.4 Existing Zoning

The Subject Lands are currently zoned SC.1-11, a specialized Service Commercial Zone. The only permitted use within this zone is a hotel. The existing zoning is shown in the figure below.



## **1.5 Proposed Zoning By-law Amendment**

The purpose of the proposed Zoning By-law Amendment is to change the zoning from the current SC.1-11 (Specialized Service Commercial Zone) to a Specialized High Density Apartment Zone (R.4B-??) to permit the development of the proposed 10 storey mixed use building with 389 Post-Secondary School Residence units together with 600 square metres of convenience commercial uses. A number of specialized regulations are required for the proposed development including increases to maximum density and a change in how density is measured (bedrooms rather than dwelling units), increased Floor Space Index, increased angular planes, reduced parking provision, reduced front and rear yard setbacks, reduced common amenity and landscaped open space requirements.

## **2.0 PLANNING ANALYSIS**

### **2.1 Consistency with the 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."*

The Provincial Policy Statement provides direction on matters of Provincial Interest related to land use planning and development. Key objectives include: building strong healthy communities, wide use and management of resources, and protecting public health and safety.

The proposed development at 785 Gordon Street supports many of the policies in the PPS (2020) since a high-density infill residential development providing housing options is proposed on the Subject Lands. In this regard, the proposed development would be consistent with Section 1.4.3 of the PPS (2020), which directs planning authorities to provide an appropriate range and mix of housing options and densities to meet the projected market-based and affordable housing needs of the current and future residents of the regional market area by: *"Permitting and facilitating: all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities."*

The term 'housing options' is used in the policy above and it is defined as follows:

*"Housing options: means a range of housing types such as, but not limited to single-detached, semi-detached, rowhouses, townhouses, stacked townhouses, multiplexes, additional residential units, tiny homes, multi-residential buildings. The term can also refer to a variety of housing arrangements and forms such as, but not limited to life lease housing, co-ownership housing, co-operative housing, community land trusts, land lease community homes, affordable housing, housing for people with special needs, and housing related to employment, institutional or educational uses."*

The proposal to develop 389 post-secondary school residence units with 520 bedrooms would provide additional housing options in the City.

In addition, the proposed development represents a compact form of development within the City's settlement area that will allow for the efficient use of land, infrastructure, and public service facilities where infrastructure is already available, and transit is available nearby. Lastly, the proposal contributes to achieving an appropriate range of housing types to help the City of Guelph meet projected requirements for current and future residents.

It is noted that virtually any development on the Subject Lands would be consistent with the PPS (2020) because it represents a form of intensification. Clearly the PPS (2020) requires that land use patterns within settlement areas be based on densities and a mix of land uses that achieve certain objectives and the proposed development would support this requirement. However, the PPS (2020) does not state that all forms of intensification are appropriate everywhere. In this regard, it is the role of the Official Plan to implement Provincial policy in a manner that is both appropriate for Guelph and which is consistent with the PPS (2020).

In this regard, Section 1.1.3.3 of the PPS (2020) indicates that planning authorities shall identify appropriate locations for intensification....'where this can accommodated.' In this regard, the City has indicated through its Official Plan that intensification is encouraged throughout the built up area and has directed certain forms of intensification to various geographies in the City. In addition, the City's Official Plan includes extensive and appropriate policies that are designed to assist decision makers when in receipt of applications such as this one to change the permissions on a property for higher density development. As will be indicated later in this report, the proposal in its current form does not conform to a number of these policies as they relate particularly to urban design and built form.

## 2.2 Conformity with the Growth Plan for the Greater Golden Horseshoe

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 (2020) 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. Overall, the proposed infill development is a compact and efficient form of development that will be served by adequate transit, infrastructure and public service facilities in the immediate built-up neighbourhood and the proposed development will contribute to the overall intensification of the City's built-up area to meet the minimum requirement.

Given the location of the Subject Lands on a major road with excellent access to transit, the proposed development would also conform to Section 2.2.1.4 of the Growth Plan, which states the following:

*"Applying the policies of this Plan will support the achievement of complete communities that:*

- b) Improve social equity and overall quality of life, including human health, for people of all ages, abilities, and incomes;*
- c) Provide a diverse range and mix of housing options, including second units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*
- e) Provide for a more compact built form and a vibrant public realm, including public open spaces;"*

Section 2.2.1.4 begins by stating that applying the policies of the Growth Plan will support the achievement of complete communities that achieve certain things, such as featuring a diverse mix of land uses, improving social equity, providing a diverse range of housing options, expanding convenient access to transit and providing more

convenient access to transit. Clearly, any intensification on any parcel of land would support these policies and in this case, additional housing options for a segment of the City's population would be provided.

However, as with the PPS (2020), the Growth Plan does not indicate that the use of every property has to be optimized to the greatest extent possible. In this regard, reliance is placed on municipal Official Plans to implement the Growth Plan and provide the direction required on how intensification is to be accommodated. In this case, the Official Plan provides considerable guidance and it is on the basis of a review of the Official Plan that it is concluded that the application in its current form does not conform to the Official Plan.

### **2.3 Conformity with the City of Guelph Official Plan**

Section 1.3 of the Official Plan indicates that the *"Official Plan must be read in its entirety as a comprehensive policy framework to be used in land use evaluation and decision making by Council, committees appointed by Council, Boards and Commissions having jurisdiction within the City, and by staff and the public, including the Ontario Municipal Board."*

Section 2.1 of the Official Plan states that the *"Official Plan is a future oriented document that sets out a course for the desired development of Guelph to 2031."* This section also includes a number of SmartGuelph Principles which are intended to guide community building discussions. The most relevant SmartGuelph principle that applies to the application is below: *"Compact and Connected: A well-designed City with a vital downtown core and a commitment to mixed-use and higher density development; a safe community conveniently connected for walkers, cyclists, users of public transit and motorists."*

Section 2.2 of the Official Plan also sets out a number of strategic goals and goal 1b) under the heading 'Planning for a Complete and Healthy Community' and goals 6 a), b), c) and d) under the heading 'Urban Design' below are relevant to the application:

*"1b) Ensure an appropriate range and mix of employment opportunities, local services, community infrastructure, housing including affordable housing and other land uses are provided to meet current and projected needs to the year 2031.*

*6a) Preserve, enhance and protect the distinct character of the city and the sense of a community of neighbourhoods.*



- 6b) *Build a compact, mixed-use and transit-supportive community.*
- 6c) *Plan and design an attractive urban landscape that reinforces and enhances Guelph's sense of place and identity while encouraging innovative design and development opportunities.*
- 6d) *Encourage intensification and redevelopment of existing urban areas that is compatible with existing built form."*

Section 3 of the Official Plan is entitled 'Planning a Complete and Healthy Community' and it to a large extent implements the many policies of the Growth Plan that requires planning authorities to direct growth to appropriate locations within the built-up area, which is where the Subject Lands are located. Section 3.7 includes a number of general policies on the built-up area and intensification a number of these policies are particularly relevant to the application affecting the Subject Lands.

- *Section 3.7.3 ii) - "The City will promote and facilitate intensification throughout the built-up area, and in particular within the urban growth centre (Downtown), the community-mixed use nodes and the intensification corridors as identified on Schedule 1 "Growth Plan Elements." In this regard, Gordon Street between Stone Road and the Community Mixed-Use Node centred on Clair Road and Gordon Street is identified as an Intensification Corridor.*
- *Section 3.7.3 iii) - "Vacant or underutilized lots, greyfield and brownfield sites will be revitalized through the promotion of infill development, redevelopment and expansions of existing buildings." The Subject Lands, given its location and current land use, would be an example of an underutilized lot, since current policies permit more development than exists as-of-right on the Subject Lands.*
- *Section 3.7.3 v) - "a range and mix of housing will be planned, taking into account affordable housing needs and encouraging the creation of accessory apartments throughout the built-up area." The provision of purpose built student housing on the Subject Lands would support this policy.*
- *Section 3.7.3 vi) - "intensification of areas will be encouraged to generally achieve higher densities than the surrounding areas while achieving an appropriate transition of built form to adjacent areas." In this regard, while the Subject Lands are large enough and ideally located to support redevelopment, the development of a long (almost 99 metres) building along Harvard Road does not conform to the urban design policies in Section 8.8 of the Official Plan and does not provide an appropriate transition to adjacent areas (discussed later).*

- *Section 3.7.3 vii) - "the City will plan for high quality public open space with site design and urban design standards that create attractive and vibrant spaces." In this regard, the proposed development on the Subject Lands, as currently proposed does not create attractive or vibrant spaces, primarily because of the massing that is proposed and the limited amount of amenity space proposed.*

Section 3.10 deals with Intensification Corridors and it is reproduced below:

1. *Intensification Corridors are identified on Schedule 1 of this Plan and will be planned to provide for mixed-use development in proximity to transit services at appropriate locations.*
2. *Intensification corridors will be planned to achieve:*
  - i) *increased residential and employment densities that support and ensure the viability of existing and planned transit service levels;*
  - ii) *a mix of residential, office, institutional, and commercial development where appropriate; and*
  - iii) *a range of local services, including recreational, cultural and entertainment uses where appropriate.*
3. *Development within intensification corridors identified on Schedule 1 will be directed and oriented toward arterial and collector roads.*

In many respects the proposed development conforms to the above policies as a consequence of the nature of the proposed use and because of its location at the intersection of an Arterial and Collector Road.

## **2.4 Assessing the Specific Request to Amend the Official Plan**

At the present time, the Subject Lands are designated Neighbourhood Commercial Centre. Permitted Uses in a Neighbourhood Commercial Centre according to Section 9.4.5.12 include commercial, retail and service uses, small-scale offices, community services, live/work units, multiple unit residential within mixed-use buildings and urban squares. The maximum permitted height in this designation is six storeys and the maximum permitted net density for residential development is 100 units per hectare. Residential uses are not permitted on the ground floor. Any development proposed would be required to conform to the urban design policies of the Official Plan according to Section 9.4.5.7, and in particular would be required to conform to Section 8.8, which

deals with mid-rise buildings (4 to 6 storeys).

A proposal to develop student housing on the Subject Lands would be permitted without an Amendment to the Official Plan, provided all of the policies of the Official Plan were met. Given the size of the Subject Lands (0.85 hectares), the Subject Lands could support about 85 dwelling units.

The applicant has requested that the lands be designated High Density Residential instead, which permits buildings that have a height of 10 storeys and a maximum permitted density of 150 units per net hectare (however, an increase in density is being requested). It is also requested that up to 600 m<sup>2</sup> of commercial floor area also be permitted, which is 200 m<sup>2</sup> greater in size than currently permitted in the High Density Residential designation. As a result, the four requests are:

1. Changing the designation from Neighbourhood Commercial Centre to High Density Residential and no longer permitting up to 6,500 m<sup>2</sup> of commercial uses on the Subject Lands (with the exception of the 600 m<sup>2</sup> proposed);
2. Changing the number of storeys permitted from 6 storeys to 10 storeys; and
3. Changing the permitted density on the lands from the currently permitted 100 units per hectare, and obtaining permission to exceed the permitted 150 units per hectare on lands designated High Density Residential such that the permitted density is 615 bedrooms per hectare.

Each of these requests is assessed below.

#### **2.4.1 Changing the land use from Commercial to Residential**

The planned function of Neighbourhood Commercial Centre designation is set out in Section 9.4.5 a) to d) below:

- "a) To establish local convenience and neighbourhood commercial uses within a convenient walking distance of residential areas.*
- b) To ensure Neighbourhood Commercial Centres are developed in a cohesive and coordinated manner that is compatible with the surrounding residential neighbourhood.*
- c) To primarily serve the shopping needs of residents living and working in nearby neighbourhoods and employment districts.*

- d) *To be connected to surrounding neighbourhoods through the City's pedestrian trails, walkways and by transit."*

Based on the above, the expectation is that lands designated Neighbourhood Commercial Centre will serve a commercial function for the benefit of the surrounding residential areas. In this regard, Section 9.4.5.11 states the following: *"Development proposals that would decrease the existing commercial gross floor area within a Neighbourhood Commercial Centre by more than 25 per cent or that would provide commercial gross floor area at less than .15 FSI will require a Commercial Function Study in accordance with the policies of this Plan."*

Section 9.4.2 of the Official Plan indicates that a Commercial Function Study shall address the following.

- "i) The availability of commercial floor space within the designation to meet daily and weekly needs of the surrounding community especially for food store, food-related store and/or drug store.*
- ii) Opportunities for additional commercial floor space to be provided elsewhere and thereby sustain the local provision of commercial floor space within that designation or in the immediate area;*
- iii) Impacts on the ability of residents and employees in the area to use active transportation options to access commercial shopping areas and commercial services; and*
- iv) Role of the commercial space in creating a community focal point."*

In this regard, a Commercial Function Study was submitted in support of the application and it essentially indicates that there are a considerable number of retail commercial uses in the general area and the loss of this site would have no impact on the ability of the residents in the area to obtain necessary goods and services. On the basis of a review of the Commercial Function Study and its conclusions, the loss of this commercial site is supportable primarily because of the adequate supply of commercial uses that already exists in the general area (across the street and along Stone Road).

#### **2.4.2 Changing the number of storeys permitted from 6 storeys to 10 storeys**

Given that up to 6 storeys is permitted on the Subject Lands, the focus of this assessment is on the request to develop 4 additional storeys. There are two sections in the Official Plan that provide guidance on how to assess these kinds of applications:

Section 8.9 'Built Form: High Rise Buildings' and Section 9.3.1.1 'Development Criteria for Multi-Unit Residential Buildings and Intensification Proposals.' Both of these sections are reviewed below.

Section 8.9 states that following policies apply to tall building forms, which generally means buildings above six (6) storeys:

- i) *To ensure tall buildings act as landmarks, they shall incorporate a distinctive bottom (e.g., a podium), middle and top. Interesting architectural features and roof treatments should be considered for all rooftops or tall buildings;*
- ii) *Parking should be provided primarily below grade with limited visitor surface parking. Structured parking above-grade may be permitted, where appropriate;*
- iii) *Built-form studies addressing building massing, shadows, views and microclimatic studies (e.g. wind) may be required to determine the potential impacts to the surrounding neighbourhood arising from tall buildings;*
- iv) *Floor plate sizes of the tower portion (e.g., storeys five (5) and above) of the building may be limited to encourage slender and elegant tall building designs; and*
- v) *The tower portion (e.g., storeys five (5) and above) of the building shall be carefully placed to ensure adequate spacing between towers to allow for solar access and privacy.*

Fotenn Planning + Design was retained by the City to review the urban design aspects of the proposal. In their comments, they conclude that the current proposal does not conform to sub-sections i), iv) and v) primarily because of the presence of a long street wall that is 98.82 metres, which is significantly exacerbated by the height of the building. In their opinion and as a best practice, *"buildings should generally be no longer than 60 m in length to provide permeability between buildings that allows for sunlight to pass through, reduces wind corridors, and allows pedestrian circulation to and through properties. The applicant should consider breaking up the massing into at least two separate buildings and implement meaningful reductions in the massing to reduce the perceived scale of the building throughout. This would help to provide for a more appropriate transition to the surrounding low-rise development and potential future mid-rise development."*

The table below reviews the conformity of the proposal with Section 9.3.1.1:

<b>Development Criteria</b>	<b>Planning Opinion</b>
<p>Building form, scale, height, setbacks, massing, appearance and siting are compatible in design, character and orientation with buildings in the immediate vicinity.</p>	<p>The massing of the development is excessive particularly due to the length of the building. Urban design best practices limit the length of buildings to 60 metres. The proposed development is 98.82 metres in length. As a result, <u>this criterion is not satisfied.</u></p>
<p>Proposals for residential lot infill will be compatible with the general frontage of lots in the immediate vicinity.</p>	<p>This criterion does not apply since a new lot is not proposed.</p>
<p>The residential development can be adequately served by local convenience and neighbourhood shopping facilities, schools, trails, parks, recreation facilities and public transit.</p>	<p>The Subject Lands are in proximity to a wide range of uses including the University of Guelph and the Stone Road Mall. The Subject Lands are connected to the arterial road network, active transit and public transit routes. Mayfield, Oak Street, Yewholme and Rickson Parks are within 800 metres of the Subject Lands. Four (4) Guelph Transit bus routes operate adjacent to or within a short walking distance from the Subject Lands. There are two GO Bus Stations within 400 m of the Subject Lands. As a result, <u>this criterion is satisfied.</u></p>
<p>Vehicular traffic generated from the proposed development will not have an unacceptable impact on the planned function of the adjacent roads and intersections.</p>	<p>Traffic staff have reviewed the proposal and found that there will be no unacceptable impact on the planned function of adjacent roads and intersections from the proposed redevelopment. As a result, <u>this criterion is satisfied.</u></p>
<p>Vehicular access, parking and circulation can be adequately provided and impacts</p>	<p>The Site Plan indicates that vehicle access would be from a single driveway situated on the northwest corner of the property on</p>

<p>mitigated.</p>	<p>Harvard Road, which seems sufficient and reduces the need for multiple curb cuts and interruptions to the sidewalk. Parking is generally well-screened from Harvard Road and Gordon Street with it being located at the rear of the building. As a result, <u>this criterion is satisfied as it relates to vehicular access and circulation.</u></p> <p>Multiple mature trees currently stand along the south edge of the property which should ideally be retained to screen and buffer the parking from the neighboring residential use. The opportunity to retain, or plant new, vegetation along this property line would be reduced if the request for the side yard setback were approved. As a result, <u>this criterion is not satisfied as it relates to the location of parking and impacts on adjacent land uses.</u></p>
<p>That adequate municipal infrastructure, services and amenity areas for residents can be provided.</p>	<p>Engineering staff have confirmed that there are no issues with respect to servicing capacity as it relates to the Subject Lands. No improvements are needed to transportation systems to accommodate the development, and the City’s three stream waste collection service will be used. As a result, <u>this criterion is satisfied as it relates to municipal infrastructure.</u></p> <p>Amenity spaces are proposed that would be located between the rear ‘wings’ of the building. These spaces are shown to feature landscaping, benches, and decorative paving, but their function and enjoyability is undermined by their co-location with functional elements of the building, including service parking, a loading bay, the</p>

	<p>exit to the building’s refuse room, and an access ramp leading to underground parking facilities.</p> <p>The shadows cast internal to the property will have a significant impact on the proposed outdoor amenity spaces with much of these spaces being in shadow throughout the day.</p> <p>As a result, <u>this criterion is not satisfied as it relates to the amount and location of amenity spaces.</u></p>
<p>Surface parking and driveways shall be minimized.</p>	<p>The proposed underground parking minimizes the need to provide surface parking. Surface parking will accommodate 45 parking spaces and the underground parking will accommodate 175 parking spaces. As a result, <u>this criterion is satisfied.</u></p>
<p>Development shall extend, establish or reinforce a publicly accessible street grid network to ensure appropriate connectivity for pedestrians, cyclist and vehicular traffic, where applicable.</p>	<p>This criterion does not apply as no new streets are planned.</p>
<p>Impacts on adjacent properties are minimized in relation to grading, drainage, location of service areas and microclimatic conditions, such as wind and shadowing.</p>	<p>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 ten storeys in height. The Shadow Study indicates that shadow impacts from the proposed development on areas external to the property are generally acceptable. As a result, <u>this criterion is satisfied.</u></p>
<p>The development addresses public safety, identified public views and</p>	<p>The proposed infill redevelopment does not impact public safety, identified public views</p>



<p>accessibility to open space, parks, trails and the Natural Heritage System, where applicable.</p>	<p>or accessibility to any open or natural spaces. As a result, <u>this criterion is satisfied.</u></p>
<p>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.</p>	<p>The existing two-storey hotel is not a cultural heritage resource and would be demolished to redevelop the site as proposed. As a result, <u>this criterion is satisfied.</u></p>

As a consequence of the above, the request to increase the height permitted on the Subject Lands from 6 storeys to 10 storeys is not supported because the increased height significantly exacerbates the impacts of the massing proposed. While there may be options available to reduce these impacts, an alternative building design was not available at the time of the writing of this report. Further details on the design of the proposal and its significant shortcomings are included within the comments provided by Fotenn Planning + Design.

### 2.4.3 Changing the Permitted Density

As per Section 9.3.5 the maximum permitted net density is 150 units per hectare. A total of 389 post-secondary school residence 1, 2 and 3 bedroom units are proposed. The most distinguishing characteristic that differentiates this type of accommodation from typical apartments is the leasing terms. Leasing occurs on a per-bed basis, rather than a per-unit basis. Known as individual leases, these agreements hold lessees responsible for only one bedroom, not an entire unit. These leases usually run with the academic year. Post-secondary school residences usually provides kitchens, communal living rooms, multiple bedrooms and multiple bathrooms or bathrooms attached with each individual bedroom, depending on the floor plan. They are often furnished and provide various amenities. Unit floor plans can also deviate from a typical apartment, appearing more like a dormitory pod type layout.

Based on the way density is calculated in the City of Guelph, the requested density is about 457 units per hectare, which significantly exceeds the maximum permitted density of 150 units per hectare. The applicant is requesting that the density metric of bedrooms per hectare (bph) be utilized instead as it is a more accurate metric for determining density. As the Planning Justification Report prepared by the applicant explains, utilizing the housing arrangement of 589 bedrooms in five-bedroom units

would result in a total unit count of 118 and about 139 units per hectare, which would adhere to the maximum net density of 150 units per hectare provision.

In conclusion, the bedrooms per hectare metric can be relied upon in this case as a means to express density. However, the built form of the development is a much more important consideration in this case and based on the current proposal, a ten storey building with the massing proposed cannot be supported.

## **2.5 Other Factors to Consider - Affordable Housing**

The policies set out in Section 7.2 of the Official Plan 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. The most relevant Official Plan policies that relate to the proposed development include:

*"7.2 h) - To ensure that an adequate supply, geographic distribution and range of housing types including affordable housing and supporting amenities, are provided to satisfy the needs of the community and to support an affordable lifestyle.*

The Planning Justification Report submitted by the applicant states:

*"Post-secondary students typically have minimal income that would be well below the annual household income for low- and moderate- income households. Students fund their accommodations through a combination of personal savings, family assistance, student loans and part time work. The Proposed Development will provide 520 additional bedrooms dedicated to students. Students require housing within the community, particularly close to the University of Guelph. Where there is not adequate purpose-built student housing, students occupy other forms of housing which removes those units from use for other members of the community. Increasing the supply and diversity of the mix of housing available will lead to a more competitive market which will allow for more affordable accommodations. Purpose built student housing will also reduce the occupancy of students in other forms of housing, resulting in additional housing options for all."*

It is noted that currently, University of Guelph students comprise 18% of the total population of Guelph (2017 data). However, it is difficult to monitor student populations as they are not tracked by census data. Since 2017, student enrolment at the University of Guelph has increased at a rate of 5% per annum. In 2022, enrolment has reached a total of 30,000 students. In June 2022, the University of Guelph announced

for the first time that it could not guarantee on-site student accommodations for first-year students. If the 5% per annum enrolment is projected out to the year 2027, this would result in a student population of approximately 38,000. On this basis, it is expected that there will be increasing demands for new purpose built student housing and there is support for the development of additional student housing in the City.

## 2.6 Conformity with Section 1.3.14 of the Official Plan

As per Section 1.3.14 of the Official Plan, when considering an application to amend the Official Plan, Council shall consider the following matters listed in **Table A**.

**Table A:** Review of matters Council shall consider when considering an Official Plan Amendment application.

Matters for Council Consideration	Planning Opinion
<p>1.3.14 i) conformity of the proposal to the strategic directions of this Plan and whether the proposal is deemed to be in the overall interests of the City;</p>	<p>The proposed Official Plan Amendment conforms to the strategic goals of the Official Plan in Section 2.2 including the following:</p> <p>Contributing to providing an appropriate range, mix and geographic distribution of housing types to meet current and projected needs to the year 2031 [2.2.1 b), 2.2.5 d)];</p> <p>Provides for urban growth and land use patterns in a manner that ensures the efficient use of public expenditures over the long term [2.2.1 c)];</p> <p>Facilitates development in an area where full municipal services and related infrastructure is readily available [2.2.4 a)];</p> <p>Build a compact, mixed-use and transit-supportive community [2.2.6 b)];</p> <p>Encourages intensification and redevelopment of existing urban areas that is compatible with the existing built form [2.2.6 d)].</p>
<p>1.3.14 ii) consistency with applicable</p>	<p>The intensification of the Subject Lands would in</p>

<b>Matters for Council Consideration</b>	<b>Planning Opinion</b>
provincial legislation, plans and policy statements;	principle be consistent with and in conformity with Provincial policy subject to meeting the urban design policies of the Official Plan.
1.3.14 iii) suitability of the site or area for the proposed use, particularly in relation to other sites or areas of the City;	While the Subject Lands can support high density residential development, the current proposal for a ten storey building is not supported.
1.3.14 iv) compatibility of the proposed use with adjacent land use designations;	While the Subject Lands can support high density residential development, the current proposal for a ten storey building is not supported.
1.3.14 v) the need for the proposed use, in light of projected population and employment targets;	The proposed use would contribute to meeting the City's population targets as a whole and within the Built Boundary.
1.3.14 vi) the market feasibility of the proposed use, where appropriate;	The applicant has determined the proposal is feasible for the site as requested.
1.3.14 vii) the extent to which the existing areas of the City designated for the proposed use are developed or are available for development;	The Subject Lands are currently designated Neighbourhood Commercial Centre and appropriate justification has been provided to change the land use designation to High Density Residential, given the ample supply of commercial lands and uses in the vicinity of the Subject Lands. However, while the Subject Lands can support high density residential development, the current proposal for a ten storey building is not supported.
1.3.14 viii) the impact of the proposed use on sewage, water and solid waste management systems, the transportation system, community facilities and the Natural	Engineering staff have stated that there are no issues with servicing the Subject Lands. The proposed redevelopment does not impact any community facilities or the Natural Heritage

Matters for Council Consideration	Planning Opinion
Heritage System;	System.
1.3.14 (ix) the financial implications of the proposed development;	Financial implications of the proposed development are outlined in the covering report in terms of estimated development charges and taxes.
1.3.14 (x) other matters as deemed relevant in accordance with the policies of this Plan.	Consideration of other relevant matters is given in this planning analysis.

Overall, the massing of the proposed development is inappropriate. The significant massing creates on-site impacts to the quality of amenity space, pedestrian and vehicle access and flow. The overall urban design characteristics such as a building length greater than 60 metres creates unnecessary shading, wind tunneling effect, and dissipates pedestrian access to the site. The applicant is encouraged to reconsider the overall site design to better address the urban design policies set out as part of the Official Plan strategic goals, the urban design principles outlined in the City of Guelph’s Urban Design Manual (2017), and Section 8.9 of the Official Plan.

**2.7 Conformity with the City of Guelph’s Zoning By-law**

The applicant is proposing to change the zoning from the current SC.1-11 (Specialized Service Commercial Zone) to a Specialized High Density Apartment Zone (R.4B-??) to permit the development of the proposed 10 storey mixed use building with 389 Post-Secondary School Residence units together with 600 square metres of convenience commercial uses.

The applicant has requested an amendment to the Zoning By-law for an extensive series of changes to zoning. The site-specific zoning provision request is provided in **Table B** below.

**Table B:** Site-specific zoning provision requests for lands municipally known as 785 Gordon Street.

<b>Site-specific Zoning provision request</b>	<b>Planning opinion</b>
Alter the maximum density from 150 units per hectare (upha) to a maximum of 615 bedrooms per hectare (bph);	The proposed density increase is not supported as a result of concerns about building massing, which is exacerbated by the proposed height of the building.
A reduction in the minimum front yard setback (Gordon Street) from 15.0 m to 9.0 m;	Section 4.24 of the City's zoning by-law requires a 15 metre setback from the centre-line of Gordon Street. As Gordon Street already has a right-of-way width of at least 30 metres adjacent to the Subject Lands, a reduction in this setback is not required.
<p>To require a minimum interior side yard setback of:</p> <p>15 m for the 1st – 5th storey;</p> <p>17 m for the 6th storey;</p> <p>20 m for the 7th storey;</p> <p>23 m for the 8th storey;</p> <p>27 m for the 9th storey; and</p> <p>30 m for the 10th storey;</p>	Table 5.4.2 of the City's zoning by-law requires a minimum interior side yard that is equal to one-half the building height. Given that the height of the building is proposed to be 30 metres, a 15 metre interior side yard would be required. Based on advice received by Fotenn Planning + Design, these unique setbacks for the upper storeys from the interior side lot line are not necessary as it relates to the townhouse development to the south, given the nature of the land use to the south and the grade difference between the Subject Lands and the lands to the south.
<p>A reduction in the minimum rear yard setback from 20% of the lot depth (27.38 m) to:</p> <p>15 m for the 1st to 5th storey;</p>	Table 5.4.2 of the City's zoning by-law requires a minimum rear yard that is equal to 20% of the lot depth or one-half the building height, whichever is greater. If the 20% requirement was applied

Site-specific Zoning provision request	Planning opinion
<p>19 m for the 6th storey;            22 m for the 7th storey; and            25 m for the 8th storey;            To apply a minimum rear yard setback of:            28 m for the 9th storey; and            29 m for the 10th storey;</p>	<p>(which would be the greater requirement), the required rear yard would be 27.38 metres. Fotenn Planning + Design states that the proposed development appears to be designed and sited to maximize density on the property, achieving 389 units/520 bedrooms. Over-building of the property leaves insufficient opportunity to achieve the functional elements needed to support a development of this scale while achieving a high quality of design. As a result, this reduction in the standard is not supported.</p>
<p>An increase in the maximum angular plane from 45 degrees to 52 degrees from the centreline of Harvard Road and 46 degrees from the centreline of Gordon Street;</p>	<p>Fotenn Planning + Design indicates that the implications of an up to 7-degree increase is not inherently significant for buildings with short street walls, but it would have a substantial impact if granted for a building 98.82 m in length unless suitable massing strategies are implemented. As a consequence, this reduction in the standard is not supported for the Harvard Road frontage.</p>
<p>A reduction in the minimum common amenity area from 7980 m<sup>2</sup> (30 m<sup>2</sup> per dwelling unit for each unit up to 20 and for each additional dwelling unit 20 m<sup>2</sup> per dwelling unit) to 14 m<sup>2</sup> of common amenity areas (this includes private balconies and terraces) per dwelling unit but not less than 50 m<sup>2</sup> collectively shall be provided;</p>	<p>Fotenn Planning + Design states that the proposed development appears to be designed and sited to maximize density on the property, achieving 389 units/520 bedrooms. Over-building of the property leaves insufficient opportunity to achieve the functional elements needed to support a development of this scale while achieving a high quality of design. As a result, this reduction in the standard is</p>

Site-specific Zoning provision request	Planning opinion
	not supported.
<p>To allow common amenity areas within the required front and exterior side yard and a length that is 4 times the width or greater;</p>	<p>Fotenn Planning + Design states that two of the proposed outdoor amenity spaces are without direct pedestrian access from the interior of the building and are accessed instead from a pathway at the rear of the building. Direct access should be considered for all of the amenity spaces, and internal links should be considered to connect the main residential entrance on Harvard Road with each amenity space via inter walkways. An atrium of sorts could be considered for linking to the central amenity space, which should be designed to have a sense of prominence, unless the spaces are consolidated, as previously suggested. If the building’s massing is separated into two or more buildings, also as previously suggested, permeability could be achieved by providing an outdoor walkway between buildings to the rear amenities. As a result, the requested standard cannot be supported.</p>
<p>To reduce the landscaped open space from a minimum of 40% to a minimum of 33%;</p>	<p>The requested reduction in landscape open space from a minimum of 40% to a minimum of 33% cannot be supported at this time.</p>
<p>A reduction to the interior side yard setback for surface parking from 3 m to 1.4 m;</p>	<p>Fotenn Planning + Design indicates that multiple mature trees currently stand along the south edge of the property which should ideally be retained to screen and buffer the parking from the neighboring residential use. The</p>



Site-specific Zoning provision request	Planning opinion
	<p>opportunity to retain, or plant new, vegetation along this property line would be reduced if the request for the side yard setback were approved, changing it from 3 m to 1.4 m, which may be insufficient to support healthy vegetation. As a result, this reduction cannot be supported.</p>
<p>To apply a parking rate of 0.25 parking spaces per bedroom for the post-secondary school residence;</p>	<p>The City's zoning by-law does not include a parking standard for post-secondary school residences. This reduction in required parking is supported given its location and ability for residents to walk, cycle or use transit. The site's close proximity to the University of Guelph, and the availability of nearby transit routes makes it viable without the standard parking requirements in the Zoning By-law. The parking standard for the proposed commercial use on the Subject Lands will be complied with.</p>
<p>To allow the 20% residential visitor parking to be provided at grade or underground;</p>	<p>Provision of underground parking minimizes the need to provide surface parking. Since the majority of proposed parking is to be provided underground, this request is supported.</p>
<p>To apply a bicycle parking rate of:</p> <p>Residential: 1 long term and 0.1 short term spaces per unit;</p> <p>Office: 0.2 long term spaces per 100 m<sup>2</sup> GFA (two spaces minimum) and 0.13 short term spaces per 100 m<sup>2</sup> GFA (two</p>	<p>The applicant is proposing 432 long term and short-term bicycle parking spaces. The long-term spaces will be provided in an indoor bicycle room on the first floor. Short term spaces will be provided within outdoor bicycle racks and in an indoor bicycle room on the first floor. With a total population of 520 students, the 432 bicycle parking spaces would provide</p>

<b>Site-specific Zoning provision request</b>	<b>Planning opinion</b>
<p>spaces minimum);</p> <p>Convenience store, financial establishment, medical office, retail establishment, service establishment: 0.1 long term per 100 m<sup>2</sup> GFA (two spaces minimum) and 0.2 short term per 100 m<sup>2</sup> GFA (two spaces minimum); and</p> <p>Restaurant: 0.1 spaces long term per 100 m<sup>2</sup> GFA (two spaces minimum) and short term two spaces per use;</p>	<p>bicycle access to 83% of residents. This request can be supported.</p>
<p>An increase of the FSI from a maximum of 1.5 to 2.55;</p>	<p>The applicant has requested a specialized regulation to permit a higher Floor Space Index (FSI), which is a measure of building Gross Floor Area (GFA) compared to the lot area. The standard zoning regulations require a maximum FSI of 1.5, which means that the GFA can be a maximum of 1.5 times the lot area. The applicant has requested a specialized regulation of a maximum FSI of 2.55. This request cannot be supported at this time because of concerns about the massing and lack of amenity space, which is exacerbated by the proposed height of the building.</p>
<p>To allow a maximum of 600 m<sup>2</sup> of convenience commercial uses on the first storey;</p>	<p>An increase of square footage for convenience commercial from 400 m<sup>2</sup> to 600 m<sup>2</sup>. This request is supported because it enables a larger area for mixed uses on the Subject Lands.</p>
<p>To permit an outdoor patio associated with a restaurant or licensed establishment on a property that abuts a</p>	<p>Building (zoning) staff has reviewed the development proposal and have indicated that they would not be supportive of a</p>

<b>Site-specific Zoning provision request</b>	<b>Planning opinion</b>
residential zone along the front lot line and interior side yard lot line that is 6 m from the interior lot line and 9 m from the front lot line;	restaurant/bar having an outdoor patio close to residential uses. This conflicting noise would be an issue that could be avoided by not permitting the patio. As a result, this request is not supported.
To increase the maximum permitted encroachment for canopies from 1.8 m to 2.6 m in all yards; and	This request is considered to be minor and can be supported.
To define a post-secondary school residence as “means the whole of an apartment building consisting of three or more Dwelling Units, each providing up to five bedrooms for hire or gain directly or indirectly that may or may not have exclusive use of both a kitchen and a bathroom. For the purposes of the subject property, the definition of Lodging House Type 2 shall not apply.”	Building (Zoning) staff has reviewed the development proposal and stated: The definition of “Post Secondary School Residence” should match the existing definition used in the R.4B-14 zone. The implications of this requested change will need to be further considered.

### **3.0 PROFESSIONAL PLANNING OPINION**

The intensification proposal on the Subject Lands is supported by Provincial policy. However, it is the role of the Official Plan to determine whether changes in land use are appropriate based on context and the policies that apply. In this regard, the current proposal does not conform to a number of urban design policies in the Official Plan primarily as a result of the proposed massing of the development along Harvard Road, and the lack of amenity spaces proposed, which is exacerbated by the proposed 10 storey height. These concerns have the potential to be overcome with a more sensitive design. However, if a decision is to be made on the current proposal, it is recommended that the applications be refused.