

Attachment-11 Staff Review and 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.

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 section 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."

The subject property is located adjacent to existing and planned residential development in the south end of the City. The proposed school will result in the development of lands with a new institutional use that will meet the long-term needs of residents of the South Guelph area and surrounding community. The proposed school will contribute to the range of uses within South Guelph, can be adequately serviced and connected to the existing road network. The proposed school is located close to existing and future residential uses and will be designed to in consideration of active transportation options in order to accommodate students who will not be bussed to school. Appropriate connections to the broader community have been contemplated through the conceptual design process as illustrated and will be refined through the site plan stage. The location of a secondary school within a growing residential area represents the efficient use of land and represents the introduction of a new institutional use that will serve the needs of the broader community.

Policy 1.6 of the PPS provides policies with respect to infrastructure and public service facilities. The PPS defines public service facilities as: land, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs and cultural services. Public service facilities do not include infrastructure.

Policy 1.6 of the PPS provides that public service facilities shall be provided in a coordinated, efficient and cost-effective manner that considers impacts from climate change while accommodating projected needs. Planning for public service facilities shall be coordinated with integrated land use planning so that they are financially viable over their life cycle and available to meet current and projected needs. Public service facilities should be co-located in community hubs where appropriate, to promote cost effectiveness, and facilitate service integration, access to transit and active transportation.

The Upper Grand District School Board has determined that a new secondary school is required in South Guelph to meet current and future student enrollment in the City of Guelph and surrounding communities. The proposed school will contribute to the range of uses within the community. The school site will be designed to be integrated with the community and optimize transportation options, including public transit and active transportation.

The PPS places a strong emphasis on the wise use and management of resources over the long term in order to conserve biodiversity, protect ecological processes and minimize environmental impacts. An Environmental Impact Study was completed in support of the proposed development and confirms the presence of Significant Woodlands and ecological linkage on the northern portion of the subject property.

Policy 2.1.8 provides that development or site alteration shall not be permitted in adjacent lands unless it has been demonstrated that there will be no negative impacts on the natural feature or its ecological function. The EIS concludes that the proposed development of the school and related amenities, with mitigation, restoration and management, will not result in negative impacts to the Significant Woodland, ecological linkage, adjacent lands or the broader Natural Heritage System or the ecologic functions of these features.

The proposed new secondary school represents the appropriate development of lands within an existing Settlement Area. The proposed secondary school will contribute to the range of uses within the community and result in the development of a necessary new public service facility. The subject lands are surrounded by existing and planned residential development and are adjacent to non-residential uses. The proposed development will satisfy an identified long-term need for a secondary school to accommodate projected student enrollment.

The proposed development is located on a property that can be adequately serviced, is well connected to the existing and planned road and transit network and can safely and efficiently integrate with the surrounding community.

Policy 4.7 of the PPS directs that a City's Official Plan is the most important vehicle for implementation of the PPS. A more detailed review on how the proposal is consistent with the above PPS policies, as well as policies in the City's Official Plan will be outlined later in this analysis.

The proposed Official Plan and Zoning By-law Amendments are consistent with the Provincial Policy Statement.

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

Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe came into effect on August 28, 2020. This is an amendment to the Growth Plan that came into effect on May 16, 2019.

The Growth Plan for the Greater Golden Horseshoe, 2019 (the Growth Plan) is issued under the Places to Grow Act and works to support the achievement of complete communities, manage forecasted population and employment growth, protect the natural

environment, and support economic development. While the PPS as outlined above provides broader policy direction on matters of provincial interest, the Growth Plan provides more focused direction for development within the Greater Golden Horseshoe area. The 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.

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.

Section 3.2.8 provides policies with respect to public service facilities. The Growth Plan directs that public service facilities and public services should be co-located in community hubs and integrated to promote cost effectiveness. New public service facilities, including schools, should be located in settlement areas and preference should be given to sites that are easily accessible by active transportation and transit. The proposed secondary school represents a new public service facility within a settlement area. As communities grow and develop, public service facilities must keep pace ensuring that residents have convenient access to the necessities for daily living. The addition of a new secondary school will contribute to the development of South Guelph as a complete community and address an identified need to accommodate high school students in the South Guelph area and surrounding communities. The proposed secondary school will be integrated with the existing and emerging community and has been appropriately located adjacent to both residential and non-residential uses. The subject property is accessible through active transportation and public transit.

The proposed Official Plan and Zoning By-law Amendments are consistent with and conform to A Place to Grow: Growth Plan for the Greater Golden Horseshoe.

Official Plan Conformity

The Official Plan land use designations that apply to the subject property are "General Residential", "Medium Density Residential", "Neighbourhood Commercial Centre (4,650m²)" and "Significant Natural Areas and Natural Areas". Within the residential land use designations, non-residential uses that are complementary to and serve the needs of the residential neighbourhoods are permitted. Such non-residential uses include schools.

The northern portion of the subject property is designated as "Significant Natural Areas and Natural Areas". Development is not proposed on this portion of the property and the applicant has prepared an Environmental Impact Study (EIS) to address development adjacent to the environmental feature and recommend appropriate setbacks (buffers) to demonstrate that there will be no negative impacts to the feature. Detailed comments on the Natural Heritage System are provided later in this analysis.

Official Plan Amendment #48 (OPA 48), a comprehensive update to the City's Official Plan, designates the subject property as "Low Density Greenfield Residential", "Medium Density Residential", "Neighbourhood Commercial Centre" and "Significant Natural Areas and Natural Areas". Non-residential uses are also permitted uses within the residential land use designations of Official Plan Amendment 48.

One of the objectives of the Residential designations is to encourage the distribution of local convenience commercial uses and institutional uses in appropriate locations within residential areas. Policy 7.2.27 of the 2001 Official Plan in effect at the time of application submission sets out criteria used to assess the development of non-residential uses in

residential area. This policy is carried forward in Official Plan Amendment 48 and outlined in Policy 9.3.1.2 of Official Plan Amendment 48. These policies are unchanged from the in-force Official Plan at the time of application submission.

The Official Plan permits a variety of non-residential uses that are complementary to and serve the needs of residential neighbourhoods within the residential land use designations. Such non-residential uses include: schools, places of worship, child care centres, municipal open space, parks, trails and recreation facilities and convenience commercial uses.

The Official Plan sets out criteria to be evaluated for non-residential uses within residential land use designations. Below is an evaluation of this criteria:

- i) Be located on an arterial or collector road.

Response: Both Arkell Road and Victoria Road are arterial roads.

- ii) Be located on the property in a manner which minimizes the impact of traffic, noise, signs and lighting on adjoining residential properties.

Response: The current conceptual site plan has been designed in consideration of impacts on adjacent residential lands. The school building is oriented towards the Victoria Road and Arkell Road intersection which will minimize impacts on adjacent residential lands. A Traffic Impact Study (TIS) has been prepared and a number of design recommendations are made to minimize traffic impacts. The detailed design of the site will occur through site plan approval where traffic, noise, light and signage issues will be considered.

- iii) Have adequate landscaping and screening to promote *compatibility* with adjacent activities.

Response: The current conceptual site plan provides sufficient space to accommodate appropriate landscaping and screening to adjacent residential lands. The northern most portion of this site contains a woodland and proposed City trail. The woodland, its associated buffer and City trail will be zoned "Conservation Land" (P.1). The P.1 zoned portion of the site will form an effective buffer for the lands to the north. Detailed landscape plans will be provided as part of a site plan application.

- iv) Have sufficient off-street parking, circulation and access points.

Response: Parking is being provided in conformity with the requirements of the Zoning By-law. Two vehicular accesses are proposed to the site. A detailed review of on-site circulation will occur through site plan approval to ensure conflicts between pedestrians, vehicles and busses are minimized.

- v) Have adequate municipal services.

Response: Engineering staff have confirmed that the proposed development can be serviced by municipal services.

The proposed development satisfies the criteria for non-residential uses.

Neighbourhood Commercial Centre

A portion of the subject property located at the corner of the Victoria Road and Arkell Road intersection is designated as "Neighbourhood Commercial Centre" in the Official Plan. Section 7.4.22 of the Official Plan provides that a Neighbourhood Commercial Centre is comprised of one or several commercial buildings on one or more properties within a compact "node" and is intended to primarily serve the shopping needs of residents living and working in nearby neighbourhoods and employment districts. Institutional and small

scale office uses may be permitted where these uses are compatible with their surroundings.

The Neighbourhood Commercial Centre designation permits institutional uses but does not specifically list schools as a permitted uses or define the term "institutional". Therefore, a site-specific amendment is proposed to add a school to the list of permitted for the portion of the subject lands designated Neighbourhood Commercial Centre.

The proposed school will not undermine the commercial function of the Neighbourhood Commercial Centre land use designation. Lands at the south-west corner of Victoria Road South and Arkell Road are currently designated, zoned and developed with commercial uses. The addition of a school use at this corner will contribute to a complete community and is compatible with other uses permitted within the Neighbourhood Commercial Centre land use designation.

The proposed development conforms to the policies of the 2001 Official Plan and Official Plan Amendment 48.

Official Plan Amendment

In accordance with Policy 1.3.14 of the Official Plan, the following criteria must be considered when evaluating an Official Plan Amendment. Staff have evaluated each of the criteria below.

- i. The 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.

The proposed Official Plan Amendment conforms to the strategic goals of the Official Plan in Section 2.2, including the following:

- Planning a complete and healthy community by ensuring an appropriate range and mix of employment opportunities, local services, community infrastructure, housing and other land uses are provided to meet current and projected needs to the year 2031 (2.2.1.b);
- 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);
- Protecting what is valuable by protecting and maintaining, enhancing and restoring the natural heritage features (2.2.2.b); and,
- Community infrastructure – provide an appropriate supply and distribution of community facilities to meet social, health and education needs of existing and future residents in a manner that maximizes accessibility (2.2.5.b);

- ii. Consistency with applicable provincial legislation, plans and policy statements.

Staff have reviewed the proposal against the policies of the 2020 Provincial Policy Statement (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe and are satisfied that the proposal is consistent with the 2020 PPS and conforms to the Growth Plan.

- iii. Suitability of the site or area for the proposed use, particularly in relation to other sites or areas of the city.

The site is suitable for the proposed use and meets the Official Plan criteria for non-residential uses within the residential land use designations.

- iv. Compatibility of the proposed use with adjacent land use designations;

The proposed use is compatible with adjacent land uses. Non-residential uses such as schools are permitted within residential land use designations of the City. A complete community includes school sites.

- v. The need for the proposed use, in light of projected population and employment targets.

The UGDSB has determined that a new secondary school is required in South Guelph to meet current and future student enrollment in the City of Guelph and surrounding communities.

- vi. The market feasibility of the proposed use, where appropriate.

This criteria is not applicable to a school site.

- 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 property was chosen by the Upper Grand District School Board for a new school. It is a size and location that meets the School Board's needs to serve the residents of Guelph and surrounding communities.

- viii. The impact of the proposed use on sewage, water and solid waste management systems, the transportation system, community facilities and the Natural Heritage System.

Review of the proposed application has determined that adequate services are available and the development can be accommodated.

- ix. The financial implications of the proposed development.

Financial implications of the proposed development are outlined at the beginning of the report in terms of estimated development charges and taxes.

- x. Other matters as deemed relevant in accordance with the policies of this Plan.

Consideration of other relevant matters are discussed in this planning analysis.

The proposed development meets the criteria for an Official Plan Amendment.

Complete Communities and Intensification

One of the key goals of the Official Plan is planning for a complete community. This includes ensuring that people's needs for daily living throughout an entire lifetime are met by providing convenient access to a mix of jobs, local services, public transportation and a full range of housing types. All projected population growth to the year 2031 is to be accommodated within the City's current settlement area boundaries and is to be achieved through promoting a compact built form.

Schools are considered to be fundamental pieces of complete communities. Schools should be distributed throughout the City to ensure they are located to best serve student populations. The proposed development will result in the addition of a key piece of community infrastructure within the South Guelph community.

Urban Design

To achieve a complete community, the Official Plan contains policies regarding urban design that apply to all development. Several urban design objectives in the Official Plan apply to the proposed development, including:

- To create neighbourhoods with diverse opportunities for living, working, learning and playing; and,
- To build compact neighbourhoods that use land, energy, water and infrastructure in an efficient manner.

Urban Design staff have reviewed the application and are supportive of the approach to the design of the site as shown on the current conceptual site plan. As part of the site plan process, further detailed comments will be discussed, which include reviewing and finalization of building materials, landscaping materials and other site plan-level design elements. This includes but is not limited to:

- Architecturally marking the corner of Victoria Road and Arkell Road and ensuring principle building entrances are placed towards the corner and are visible from the intersection. A high standard of design will be required through a combination of building elevation design and landscaping elements (e.g. trees and other landscaping, feature lighting, public art etc.).
- The use of predominantly natural materials as part the building design are encouraged (e.g. stone, brick). Articulated facades will be required facing Victoria Road and Arkell Road.
- Refining the pedestrian connections between the building entrances to the municipal sidewalk, bus stops and the intersection.
- Continuing to explore active transportation connections to (e.g. from the west) and through the site.

Final comments provided by the City's Senior Urban Designer are included in Attachment-13.

Review of Proposed Zoning

The following two zones are proposed on the subject property as shown in the proposed zoning map in Attachment-7: "Conservation Land" (P.1) Zone and a "Specialized Educational, Spiritual and Other Services" (I.1-17) Zone.

One site-specific regulation is recommended for the "Specialized Educational, Spiritual and Other Services" (I.1-17) Zone. Staff are recommending this specialized regulation to ensure the building is placed near the intersection of Victoria Road South and Arkell Road in conformance with urban design policies of the Official Plan. The minimum building setback in the standard "Educational, Spiritual and Other Services" (I.1) Zone is 6 metres and the maximum front and exterior side yard setback in the standard I.1 Zone is 20 metres. Staff are recommending a maximum front and exterior side yard setback of 15 metres. The building will therefore be located between 6 and 15 metres from Arkell Road and Victoria Road South. 15 metres was recommended to ensure the building will be located outside of the sightline triangle, but still close to the corner.

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, commercial and institutional development includes sustainable design features.

The Owner has indicated that they will be including a number of energy efficiency measures within the proposed development consistent with the City's Community Energy Initiative (CEI) 2019 update. These initiatives proposed by the Owner will contribute to the City meeting its goal to become a net zero community by 2050. The Owner has provided a letter summarizing how their proposal addresses the CEI update (2019), and it is included in Attachment-12.

Staff are recommending a condition to be implemented through site plan approval that the Owner shall provide a commitment to incorporate features into the development that will contribute to meeting the action items from the CEI (see condition in Attachment-4).

Municipal Services and Infrastructure

Policy 6.1.3 of the Official Plan requires all new development to be on full municipal services, including sanitary sewers, water supply, stormwater management and transportation networks. Engineering staff have reviewed the development proposal and supporting studies and have confirmed that the development can be supported by full municipal services and that capacity is available. The storm outlet for the site will require the upsizing and replacement of a section of municipal storm sewer on Victoria Road South. Prior to site plan approval, the property Owner will be responsible for all costs associated with connecting, decommissioning existing and upgrading municipal services, where necessary. Comments from Engineering are included in Attachment-13.

Transportation

The applicant submitted a Transportation Impact Study (TIS), based upon an agreed upon Terms of Reference (ToR) as part of a complete application. A second TIS, and third and fourth revisions to it were submitted to address staff comments. The TIS examined the proposed development's anticipated impact on the study area traffic operations and identifies potential improvements to operations, if needed.

The City's Transportation Engineer and Traffic Services staff have reviewed all four submissions and are generally supportive of the TIS and current conceptual site plan submitted with the fourth submission.

An updated Traffic Impact Study will be required prior to site plan approval to address final comments from Transportation staff.

Comments from transportation and traffic staff are included in the memo provided by engineering and attached in Attachment-13.

Parking

The current conceptual site plan shows 246 parking spaces on site. Section 4.13.4 of the Zoning By-law requires 3 parking spaces per classroom for a secondary school plus required parking for a public hall.

The breakdown for parking is as follows:

56 classrooms x 3 parking spaces = 168 parking spaces

Public Hall (proposed 750 square metres of Gross Floor Area (GFA) requires 1 space per 10 square meters of GFA) = 75 parking spaces

Total parking required = 243 parking spaces

The proposed parking exceeds the minimum requirements of the Zoning By-law.

Natural Heritage System

The northern portion of the subject property is designated as "Significant Natural Areas and Natural Areas". Development is not proposed on this portion of the property and the

applicant prepared an Environmental Impact Study (EIS) and addenda to address development adjacent to the environmental features.

The EIS identified a locally significant woodland adjacent to the northwest portion of the subject property, with portions extending along the northern portion of the subject property. The EIS recommends a 10 metre buffer to ensure the protection of the significant woodland. The conclusions contained in the EIS confirm no negative impacts will result from the proposed development with the implementation of the recommended mitigation, restoration and management measures contained in the EIS. An Environmental Implementation Report (EIR) is required prior to site plan approval and a condition has been included in Attachment-4 to this effect. The woodland, buffer and City trail will be zoned "Conservation Land" (P.1) through this application.

Comments from environmental planning staff are included in Attachment-13.

Park and Trail

Park and Trail Development staff have reviewed the application and are in support of the proposed off-road trail alignment, as shown on the current conceptual site plan, to connect the Victoria Park Village subdivision through the subject property to the Victoria Road South and Arkell Road intersection. Conditions from Parks staff have been included in Attachment-4.

Comments from Parks staff are included in Attachment-13.

Comments Received on the Applications

Questions and issues raised by Council and members of the public in response to the applications that were not discussed in detail earlier in this analysis are summarized and responded to below.

Lighting

As part of site plan approval, the applicant will be required to provide a detailed photometric plan, prepared by a Professional Engineer. The photometric plan will be required to demonstrate that there will be no light trespass onto adjacent private properties from exterior lighting fixtures. On the photometric plan, the applicant will be required to demonstrate that there are negligible foot-candle lighting measurements along all private property lines and include details on the types and locations of exterior light fixtures proposed.

Solid Waste

The applicant will be required to complete a Waste Management Plan as part of their site plan application that will ensure the development has and maintains a three stream waste system (i.e. recycling, organics, garbage).

Transition to rural environment

Comments from the Township of Puslinch were received regarding consideration of a building setback of approximately 10-15 metres to provide a soft transition to the rural environment. The minimum front and exterior side yard setback in the standard "Educational, Spiritual and Other Services" (I.1) Zone is 6 metres and the maximum front and exterior side yard setback in the standard I.1 Zone is 20 metres. Staff are recommending a specialized regulation for a maximum front and exterior side yard setback of 15 metres to ensure the building is placed near the intersection of Victoria Road South and Arkell Road in conformance with urban design policies of the Official Plan. The most recent conceptual site plan shows a minimum building setback of 6.3 metres along Victoria Road South, however, this will need to be increased to accommodate the sight line triangle. Setbacks are measured from the new property line after a 4 metre road

widening along the Victoria Road South frontage and a 5 metre road widening along the Arkell Road frontage are dedicated. Staff are not recommending a minimum building setback of 10 metres, as a maximum setback of 15 metres is already recommended and having both a minimum and maximum is too restrictive and does not allow for enough flexibility during the site plan approval process. As part of the site plan approval process, building design, materials and landscaping will be used to achieve an appropriate transition to the rural environment to the east.

Commercial use in the school building

A question was asked at the public meeting whether there could be commercial uses open to the public located within the school building. The applicant responded that allowing the public access to the school building would pose safety concerns. The intent of the Neighbourhood Commercial Centre land use designation is to allow for local convenience commercial and service uses within walking distance of residential areas to serve the surrounding neighbourhoods. The proposed school will provide a service for the surrounding residential neighbourhoods. The school use does not undermine the commercial function of the Neighbourhood Commercial Centre land use designation. The addition of a school use at this corner will contribute to a complete community and is compatible with other uses permitted within the Neighbourhood Commercial Centre land use designation.