



July 10, 2020

File No. 19147

City of Guelph
1 Carden Street
Guelph, ON N1H 3A1

Attn: Mayor Guthrie and Members of Council

**Re: 70 Fountain Street East, Guelph
Proposed Official Plan Amendment and Zoning By-law Amendment
File OZS19-015
Additional Information to Planning Justification Report**

GSP Group is the land use planning consultants for Skydevco Inc. for their proposed development at 70 Fountain Street in Guelph. We prepared planning and urban design reports in support of the proposed applications, which were submitted in December 2019. We would like to provide additional information and our planning opinion to Council with respect to the new 2020 Provincial Policy Statement.

Our Planning Justification Report (December 2019) assessed the 2014 Provincial Policy Statement as the in-force policy statement at the time of application submission as part of the review of planning policies in justifying the proposed applications. However, it also referenced the policies of "2019" Provincial Policy Statement, which was a draft version that was in the commenting period at the time. This draft shed light on the expected planning policy direction from the Province.

Further to the application submission in December 2019, the 2020 Provincial Policy Statement (the "2020 PPS") came into effect on May 1, 2020, replacing the 2014 PPS. The 2020 PPS is now the in-force land use planning foundation on matters of provincial significance. The principal modifications in the 2020 PPS policies resulted from the review process emanating from Ontario's Housing Supply Action Plan ("More Homes, More Choices") that was passed by the Ontario government in 2019. It represents a fundamental change in Provincial policy direction on a number of key themes.

Section 3(5) of the *Planning Act* specifically requires that once approved, all decisions of the municipality's council respecting the exercise of any authority regarding a planning matter, shall be

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consistent with the 2020 PPS. Given this, it is prudent to provide additional information to our original Planning Justification Report for Council's consideration

A fundamental broad change to the 2020 PPS is the strengthening of the emphasis on transit-supportive development from that of the 2014 PPS. To start, the 2020 PPS revised the definition for "transit-supportive" as it concerns land use patterns to additionally mean development that "optimizes investment in transit infrastructure" and now referring to transit-supportive development as often meaning *"compact, mixed-use development that has a high level of employment and residential densities, including properties in proximity to transit stations"*.

Regarding policy changes affecting transit-supportive development considerations, there are four key modifications that are relevant to 70 Fountain Street and the proposed development:

1. As part of sustaining healthy, livable and safe communities, Section 1.1.1 e) was revised to promote 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"*.
2. As part of planning and growth in settlement areas, Section 1.1.3.3 was revised to further support transit-supportive development by requiring municipalities to identify appropriate locations and promote opportunities for *"transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment"*.
3. As part of the housing section, Section 1.4.3 e) added as a new policy requiring *"transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations"* as part of a municipality's requirement to provide a mix of housing options and densities to meet "market-based" needs.
4. As part of land use and development patterns that prepare for the climate change impacts, Section 1.8.1 e) now specifically encourages *"transit-supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion"*.

The above policy modifications to the 2020 PPS further the opinion advanced in our 2019 Planning Justification Report, which stated, generally, the existing designation on the site is an underutilization of site facing a major transit station. This existing "Institutional or Office" designation with a permitted building height range of 3 to 6 storeys is not consistent with the 2020 PPS. Such a use and intensity does not optimize, or make best use, of investments in transit infrastructure; does not reflect a

compact, mixed-use development that has a high level of employment and residential densities; and does not contribute to a market-based mix of housing options as part of the requirement of transit-supportive development surrounding stations.

In conclusion, the proposed Mixed Use 1 designation and proposed building intensity is consistent, in our opinion, to the above 2020 PPS direction. It includes a significant component of office uses and rental housing options in keeping with market trends of more compact housing options surrounding major transit facilities within a downtown setting. It better optimizes the use of a prominent, transit-proximate site in Guelph. For these reasons, and those advanced in our Planning Justification Report, the proposed development and applications continue to be good planning.

Sincerely,
GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Senior Associate