



WESTON CONSULTING

planning + urban design

Planning and Building Services
City of Guelph
Guelph City Hall
1 Carden Street
Guelph, ON N1H 3A1

September 27, 2021
File: 9373

Attn: Michael Witmer, Senior Development Planner

Dear Sir,

**RE: Planning Justification Addendum – Letter Report
Resubmission - Revised Official Plan Amendment and Zoning By-law Amendments
1354 Gordon Street, City of Guelph
File OZS19-008**

1. Introduction

Weston Consulting is the planning consultant for 1354 Gordon Street Inc., the property owner of the lands known municipally as 1354 Gordon Street in the City of Guelph (herein referred to as the “subject property”). On August 30, 2019, applications for Official Plan Amendment and Zoning By-law Amendment were submitted to permit an eight-storey mixed-use building with 88 apartment units and a gas bar with a convenience store on the subject property. Following this submission, a statutory public meeting was held on November 12, 2019. In response to the proposed development, comments were received from the public, members of Council, and various City departments and agencies. In response, a number of adjustments have been made to the proposed development to address those comments. A revised design concept has been prepared which results in revisions to the applications and which includes changes to the proposed use and unit number considering the land use policies, built form, and project feasibility. This addendum to the original Planning Justification Report dated August 2019 is prepared in support of the resubmission for both the revised Official Plan and Zoning By-law Amendments to permit the proposed development of an eight-storey apartment building with 110 units and ground floor commercial/retail use.

a. Purpose of Letter Report

The purpose of this report is to provide an overview of the revisions made to the proposed development and requested amendments since its previous submission in August 2019. The report also includes a response to the comments received from Planning Staff and the public after the first submission. In addition, the report addresses Planning Staff comments on the revised proposal in 2020. Finally, the report presents a planning opinion to justify further that the proposed revised design and revised amendments are consistent with the 2020 Provincial Policy Statement,

and that they conform to the 2019 Growth Plan and the City of Guelph Official Plan, and that they provide development that is compatible and complementary with the surrounding context. Reference should be made to the updated Urban Design and Sustainability Brief by Weston Consulting when reading this Addendum Report as it provides detailed information, including graphics, regarding the surrounding land uses and context of the subject site.

While the Growth Plan 2019 was in effect at the time of filing the applications and has been addressed in the original Planning Justification Report, this Addendum focusses some attention on the PPS 2020 which was not in effect at the time of filing.

b. History of Application

The subject property is designated as “*Neighbourhood Commercial Centre*” as per the City of Guelph Official Plan and zoned as “*Urban Reserve (UR) Zone*” as per the City of Guelph Zoning By-law (1995)-14864. As stated above, Official Plan Amendment and Zoning By-law Amendment applications were submitted on August 30, 2019. The Official Plan Amendment application was submitted for a site-specific policy to facilitate the proposed development with an increase in maximum height from 6 to 8 storeys. In addition, the Zoning By-law Amendment application proposed to rezone the land to an ‘*R.4A*’ (*General Apartment*) Zone with site-specific exceptions to permit the proposed mixed-use building, convenience store and gas bar on the subject property.

The original proposed eight-storey mixed-use building included 785 m² of ground-floor commercial/retail use with a total gross floor area (GFA) of 11,400m², a total net Floor Space Index (FSI) of approximately 1.9, a lot coverage of roughly 38.7%, and a density of 139 units per hectare. The proposed building also included 189 m² common amenity area which was considered not adequate according to comments made at the statutory public meeting. In addition, the proposed building provided a total of 212 parking spaces with two levels of underground parking to accommodate parking for residential units, visitors, retail use, and the convenience store. A number of sustainability and energy incentives were also included. The statutory public meeting to consider the proposed amendments was held on November 12, 2019.

An interim revised development concept (October 19, 2020) was submitted to the City, and a staff meeting was held on October 26, 2020, to review the proposal. The revised concept proposed an eight-storey mixed-use building as previously proposed without a gas bar. The building maintained the ground floor commercial/retail and the upper floor residential uses. A total of 116 residential units were proposed with 144 parking spaces, and 73 bicycle parking stands. The revised development proposed a total gross floor area (GFA) of 14,362m², a total net Floor Space Index (FSI) of approximately 2.25, and a density of approximately 184 units per hectare. The proposed development provided a total of 1,613 m² of common amenity area (including outdoor and indoor areas) and 421 m² retail space on the ground floor. The comments received from Planning Staff generally supported the proposed development from the design perspective with some concerns regarding the proposed net density. However, the comments from Planning Staff also recognized that the *Neighbourhood Commercial Centre* land use designation in the Official Plan did not contain a policy for maximum density when the application was first submitted to the City.

2. Revised Development & Applications

a. Revised Development Proposal

The final revised concept which is the subject of this report, prepared by SRM Architects, retains the previous development concept of an eight-storey mixed-use building with commercial use on the ground floor and residential units on the upper floors. The building has been extended south. The gas bar originally proposed on the site's south portion, is removed from the conceptual site plan. The revised development proposal will require an Official Plan Amendment for an increase in maximum building height from 6 to 8 storeys and a Zoning By-law Amendment to rezone the land to a 'NC-XX (HXX)' (*Specialized Neighbourhood Shopping Centre*)(*Holding*) Zone with site-specific exceptions to facilitate the implementation of the proposed mixed-use development, upon removal of a holding symbol which requires a sanitary superpipe in Gordon Street. Draft Official Plan and Zoning By-law Amendments are included with this resubmission.

The revised development concept includes several modifications and adjustments to incorporate the comments received from Planning Staff, various City Departments, Councillors and the public. The revised development proposal has a total gross floor area (GFA) of 12,410m², a total net Floor Space Index (FSI) of approximately 1.95, and a density of approximately 172 units per hectare. The proposed apartment building includes 110 rental residential units, consisting of studio, one-bedroom, two-bedroom, and three-bedroom units. The proposed building provides for both outdoor amenity and indoor amenity space on the first, second, third, and eighth floors, with additional amenity space on the rooftop podium for a total of 2,505m² of common amenity area. The concept also provides 421 m² of ground floor commercial (currently intended as a Brew Pub Restaurant or Restaurant, Tavern in zoning terms), fronting onto Gordon Street and Arkell Road, to enhance the current and future use and activities on the *Intensification Corridor* along Gordon Street. For the vehicle and bicycle parking, a total of 159 parking spaces and 73 bicycle stalls are provided. Sustainability and energy efficient features include the proposed mixed used building, increased landscaping including a green roof to offset the urban heat footprint, bicycle stalls and storage, an infiltration gallery, and a compact design which uses available servicing and transit. Additional features will be determined through the Site Plan approval process.

Access to the residential building is provided from Gordon Street and the parking area at level 2. In addition, a secondary entrance to the residential area is provided from Gordon Street at the centre portion of the building. The primary access to the commercial/retail space is provided from the Gordon Street and Arkell Road intersection. Furthermore, an additional entrance is provided from Arkell Road to the commercial/retail area. The proposed development offers two separate vehicle entrances for residential use and commercial/retail use. The residential and commercial parking entrance is located on Gordon Street at the southeast corner, while the visitor parking entrance is located on Arkell Road at the northwest corner of the property.

Site Statistics

	August 2019	September 2021
Site Area	6333.7 m ²	6383m ²
Net Site Area (less site dedication)	6065.7 m ²	6114m ²
Retail Gross Floor Area	785 m ²	421
Residential Gross Floor Area	10,615 m ²	9,687
Total Gross Floor Area	11,400 m ²	12,410
Floor Space Index (FSI)	1.9	1.95
Units per Hectare (UPH)	139 UPH	172 UPH
Total Lot Coverage (Apartment)	38.7%	44%
Total Landscape Open Space	22.16%	33%
Green Roof		35% of Landscaping
Common Amenity Area	189 m ²	2,505
Number of Storeys	8	8
Total Units	88	110
Studio		4 (3.6%)
One Bed	30 (34%)	48 (43.6%)
Two Bed	58 (66%)	56 (50.9%)
Three Bed		2 (1.8%)
Total Vehicular Parking	212	159
Residential	115	110
Visitor	23	15
Retail/Restaurant	58	34
Gas Station/Convenience Store	16	
Total Bike Parking		73
Residential		73

b. Revised Draft Official Plan Amendment

The Subject Property is designated as *Neighbourhood Commercial Centre* within the City of Guelph Official Plan. The Official Plan permits commercial, retail, and service uses and multiple-unit residential within mixed-use buildings on the subject property. However, the *Neighbourhood Commercial Centre* designation allows a maximum six (6) storey building height. The revised development proposal will require an Official Plan Amendment with a site-specific policy to permit the proposed eight-storey mixed-use building on the subject property. The Official Plan Amendment will introduce a new site-specific sub-policy for the subject property to allow an eight (8) storey mixed-use building with a maximum of 110 dwelling units. Section 9.4.5.15 of the Plan will need to be amended to include the new site-specific sub-policy.

The proposed amendment will permit intensification and the efficient use of underutilized lands along an intensification corridor. The proposed development will provide a range and mix of rental housing supply to accommodate future growth, offer affordable housing choices to people with

diverse household sizes and incomes, and support a complete community. Furthermore, the proposed development will optimize existing municipal infrastructure, transit services, and community facilities. In addition, the proposed development will provide high-quality architecture with outdoor amenity spaces and landscaping to enhance the public realm.

The proposed development is in keeping with the intent of the City of Guelph Official Plan and will assist the City in achieving its planned intensification along Gordon Street.

A copy of the draft Official Plan Amendment is submitted with the application.

c. Revised Draft Zoning By-law Amendment

In order to implement the development proposal and permit the proposed building height, density and required development standards, a revised draft Zoning By-law Amendment has been submitted. It is proposed that the subject property be rezoned to NC-XX (HXX) (Specialized Neighbourhood Shopping Centre) (Holding) Zone, with site specific exceptions to allow for the proposed eight (8)-storey mixed-use apartment building.

The NC Zone has been chosen as the base zone over the previous R.4A Zone as it was originally designed to implement the Neighbourhood Commercial Centre designation in the Official Plan which permits both commercial and residential uses, recognizing that the NC Zone does not fully implement the current Official Plan in terms of the maximum 6 storey height. The proposed zoning adds exceptions and a holding provision to implement the Official Plan as proposed to be amended and to accommodate the revised design.

The proposed NC-XX (HXX) Zone provides the following:

1. Add the permitted use of Restaurant, Tavern.
2. Reduce Minimum Side Yard to 8.0 metres.
3. Increase Maximum Building Height to 27 metres (8 storeys) plus mechanical penthouse of 3.5 metres, conforming to requested OPA.
4. Increase Maximum Gross Floor Area to 12,500 square metres for all uses and reduce to 425 square metres for all non-residential uses.
5. Add Maximum Number of Dwelling Units of 110 reflecting servicing and transportation studies.
6. Increase Maximum Angular Plane from Arkell Road to 47 degrees.
7. No Planting Strip shall be required adjacent to Gordon Street (planting strip on Landscape Plan is variable and can be controlled through Site Plan Control).

8. Add a Minimum Common Amenity Area of not less than 30 m² per dwelling unit for each unit up to 20. For each additional dwelling unit, not less than 20 m² of Common Amenity Area shall be provided and aggregated into areas of not less than 50 m². The NC Zone does not contain a provision for common amenity area and this standard reflects the R4A Zone provisions and is a significant increase from the original proposal.
9. Minimum Parking (supported by Parking Review):
 - 1 space per dwelling unit for residents plus 0.13 spaces per dwelling unit for visitors.
 - 1 space per 12.4 square metres of Gross Floor Area for Restaurant, Tavern.
10. Holding Provision conditional on the City of Guelph being satisfied that adequate municipal sanitary sewer capacity is available for development through the construction of a City capially funded oversized sanitary sewer upgrade within Gordon Street. This reflects the findings of the servicing study.

A copy of the draft Zoning By-law Amendment is enclosed.

3. Updated Policy Analysis & Justification

a. Provincial Policy Statement 2020

The Provincial Policy Statement (PPS) provides policy direction on matters of provincial interest related to land use planning and development throughout the Province of Ontario. The new PPS policies came into effect on May 1, 2020, replacing the 2014 PPS. Per Section 3(5)(a) of the *Planning Act*, all decisions affecting land use planning matters made after this date are required to be consistent with the PPS 2020. In addition, the PPS 2020 includes a number of key policy changes, including housing land supply, municipal servicing, climate change, and green infrastructure.

The following is an evaluation of the new PPS policies which reflect how the proposed amendments and development are consistent with the PPS 2020:

The PPS introduced a market-based approach to housing and includes additional language to encourage transit-supportive development. In particular, Policy 1.1.1 provides that healthy, livable and safe communities are sustained by:

- b) *accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- e) *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;

These changes reflect the Province's effort to increase the available housing supply by encouraging a mix of residential types to accommodate projected market-based and affordable housing needs. The PPS also promotes the integration of land use planning, growth management, transit-supportive development, intensification, and infrastructure planning to achieve cost-effective development patterns and optimize transit investments. The proposed amendments and development are consistent with the above policies. They support a more intensified and efficient use of underutilized lands and provide a range and mix of rental residential units to accommodate future growth. In addition, the proposed development improves the efficiency of land resources in the Province by promoting intensification and development supported by existing and planned municipal infrastructure and public transportation facilities.

The PPS also increased the land supply requirements through a number of policy changes.

1.1.2 Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of up to 25 years, informed by provincial guidelines. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.

Within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas.

1.4.1 To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through residential intensification and redevelopment and, if necessary, lands which are designated and available for residential development; and*
- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.*

Upper-tier and single-tier municipalities may choose to maintain land with servicing capacity sufficient to provide at least a five-year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment, and land in draft approved and registered plans.

The new PPS 2020 requires that sufficient land must be made available to accommodate an appropriate range and mix of land uses for a time horizon of up to 25 years, which is an increase from the previous 20-year time horizon prescribed by PPS 2014. Similarly, planning authorities are required to maintain the ability to accommodate residential growth through residential intensification and redevelopment for a minimum of 15 years, which is also an increase from the previously mandated 10 years. Furthermore, upper and single-tier municipalities can maintain

serviced residential lands to provide at least a five-year supply of residential units through residential intensification and redevelopment. The above policies reinforce the need for allocating sufficient land supply to accommodate projected residential growth for an increased time horizon through intensification and redevelopment.

Section 1.1.3.2 of the PPS provides that land use patterns within settlement areas shall be based on densities and a mix of land uses which efficiently use land, are appropriate for and efficiently use the infrastructure and public service facilities which are planned or available, which minimize negative impacts to air quality and climate change and promote energy efficiency and which support active-transportation and transit.

Section 1.1.3.3 of the PPS requires planning authorities to identify appropriate locations to promote housing options and transit-supportive development through intensification and redevelopment, where existing or planned infrastructure and public service facilities are available.

Section 1.1.3.4 of the PPS promotes appropriate development standards to facilitate intensification, redevelopment, and compact built form while mitigating public health and safety risks.

Section 1.1.3.5 of the PPS directs planning authorities to *“establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions”*.

The proposed development will intensify underutilized land while also providing a mix and range of housing options including rental units for City residents. The proposed amendments and development assist in maintaining the growth objectives of the PPS by providing additional housing units and retail services in a location close to public transit and pedestrian sidewalks and cycling routes with bicycle parking on-site, existing and planned municipal services (superpipe for sanitary services), and a wide range of amenities. The proposed zoning standards in the draft ZBA filed with the resubmission allow for compact intensified redevelopment with provisions for increased building height and density, appropriate yards and reduced parking which will support transit and active transportation. Detailed design will be addressed at the Site Plan Control stage to ensure that City design objectives are met. Features to mitigate air quality and climate change and promote energy efficiency include the proposed mixed used building, increased landscaping, an infiltration gallery, bicycle stalls and storage, and a compact design which uses available servicing and transit and such features will be further reviewed at Site Plan.

In our opinion, the proposed amendments and development are consistent with the above policies as they provide for appropriate intensification, achieve a compact built form, maintain applicable development standards, and respect the surrounding context.

b. The City of Guelph Official Plan (June 2021 Consolidation)

The City of Guelph Official Plan (OP), adopted by the City of Guelph Council on November 1, 1994, has been comprehensively updated through Official Plan Amendment (OPA) 39, OPA 42 and OPA 48. The June 2021 consolidation includes all amendments up to OPA 64, as consolidated

through the Ontario Municipal Board approval of OPA 48 and includes OPA 65 through OPA 70 and OPA 72 through OPA 75 approved by Guelph City Council. It is noted that the 2021 Office Consolidation had modified some key policies contained in the March 2018 Official Plan Consolidation, when the original Official Plan Amendment and Zoning By-law Amendment applications were first filed in August 2019. Some of the applicable policies relevant to the revised development proposal are discussed in this section below.

Section 3 of the Official Plan outlines a number of strategic objectives of creating a complete community, including directing growth to locations within the built-up area where the capacity exists to accommodate the expected growth.

3.1 Complete and Healthy Community

1. Planning for a complete community, as a central theme to this Plan, is focused on the achievement of a well-designed, compact, vibrant city that provides convenient access to:

- ii) a range of housing options;*

The revised development proposal includes studio and three-bedroom units in addition to previously proposed one and two-bedroom units, thereby supporting the achievement of a complete community by offering a better mix and range of housing options.

3.6 Housing Supply

1. To provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents, the City shall:

- i) maintain at all times the ability to accommodate residential growth for a minimum of 10 years through residential intensification and redevelopment and on lands which are designated and available for residential development; and*
- ii) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a 3 year supply of residential units available through lands suitably zoned to facilitate residential intensification and redevelopment and land in draft approved and registered plans*

This minimum requirement for housing land supply has been modified by the PPS 2020 to accommodate the increased housing demand through intensification. The PPS requires planning authorities to maintain the ability to accommodate residential growth for a minimum of 15 years and allows municipalities to maintain a five-year supply of serviced residential lands. Residential intensification and redevelopment are encouraged to achieve these targets. The applications and proposed development will help City achieve these targets.

3.7 Built-up Area and General Intensification

3. Within the built-up area the following general intensification policies shall apply:

- iv) the City will plan and provide for a diverse and compatible mix of land uses, including residential and employment uses to support vibrant communities.*

- v) *a range and mix of housing will be planned, taking into account affordable housing needs and encouraging the creation of additional residential dwelling units.*
- 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.*
- viii) *development will support transit, walking, cycling for everyday activities.*

The proposed development consists of 110 rental residential units, including studio, one-bedroom, two-bedroom, and three-bedroom units. This mix and increased housing supply will serve to accommodate people with diverse household sizes and incomes. It will provide affordable housing choices and will support the achievement of a complete community. Furthermore, the proposed development offers a significant number of bicycle parking spaces, connections to the City pedestrian and cycling system, and is in proximity to transit. The proposed intensification achieves an appropriate transition with the adjacent areas through setbacks and angular planes.

3.10 Intensification Corridors

The subject property is identified on Official Plan Schedule 1 - Growth Plan Elements as within an Intensification Corridor along Gordon Street.

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.*

As one of the most important policies applicable to the subject site, the proposed development and amendments support this policy by providing a mixed use development at 172 uph and 8 storeys on an arterial street (Gordon Street) which is served by City transit with connections to GO Transit.

3.15 Transportation

1. *The City's transportation system will be planned and managed to:*
 - i) *provide connectivity among transportation modes for moving people and goods;*

- ii) *offer a balance of transportation choices that reduces reliance upon any single mode and promotes transit, cycling and walking;*
- iii) *be sustainable, by encouraging the most financially and environmentally appropriate mode for trip-making;*
- iv) *offer multi-modal access to jobs, housing, schools, cultural and recreational opportunities and goods and services;*

The applications and proposed development support the above transportation objectives by promoting sustainable modes of transportation such as transit, cycling, and walking.

4.6 Climate Change

1. *The City will establish policies and undertake programs to target reducing annual greenhouse gas emissions by 60% from 2007 levels to 7 tonnes of carbon dioxide (equivalent) per capita by 2031.*

The applications and proposed development support reducing greenhouse gas emissions and the impacts of climate change by providing a compact built form located adjacent to transit and active transportation facilities and community services. The transit services available to the subject lands offer connections to GO transit creating greater accessibility to inter-regional travel. In addition, the presence of retail facilities on the site and community services nearby provides choice in transportation modes, therefore reducing reliance on personal vehicle use and supporting long-term environmental preservation and conservation. A number of other sustainability and energy efficient features as described in the revised development are proposed which assist in minimizing the negative impacts to climate change.

5.4 Active Transportation – Walking and Cycling

Active transportation which includes pedestrian movement, cycling and any nonmotorized modes of transportation is a component of achieving the City's transportation, sustainability, community energy and healthy community objectives.

1. *The City supports walking and cycling as priorities when designing the transportation system with a focus on connecting land uses to meet the community's mobility needs.*

The applications and proposed development promote active transportation use and provide a safe pedestrian environment. The provision for 73 bicycle parking stalls will encourage the residents to develop cycling habits. Further, the presence of on-site retail and amenity spaces will reduce reliance on personal vehicle use.

9.4.5 Neighbourhood Commercial Centre

The subject property is designated Neighbourhood Commercial Centre as per City of Guelph Official Plan Schedule 2 – Land Use. It is noted that policies related to commercial gross floor area and net density for residential use have been added to the Official Plan since filing of the subject applications in August 2019:

11. *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.*

Height and Density

15. *The maximum height is six (6) storeys.*
16. *For residential development, the maximum net density is 100 units per hectare.*
17. *Notwithstanding Policy 9.4.5.16, the maximum net density for residential development for the Willow Road and Dawson Road Neighbourhood Commercial Centre is 150 units per hectare.*
18. *Additional building height and density may be considered subject to the Height and Density Bonus provisions of this Plan.*

The *Neighbourhood Commercial Centre* designation permits a maximum height of 6 storeys which is requested to be increased to 8 storeys through the OPA application. The Official Plan at the time of filing of the subject applications had no density restrictions and such new policies do not apply through application of the *clergy principle*. It was confirmed through discussions with Planning Staff in the City that the new policy limiting net residential densities on the subject lands does not apply to the proposed development. Therefore, the density policy of a maximum of 100 units per hectare included by OPA 69 does not apply to the proposed rezoning. Similarly, the minimum commercial gross floor area requirement of 0.15 FSI is not applicable considering its later addition to the Official Plan.

Section 9.4.5.18 has a provision to allow additional height and density through the Official Plan's height and density bonusing provisions. It is also noted that OPA 69 has included an exception to permit the maximum net residential density of 150 units per hectare for the Willow Road and Dawson Road *Neighbourhood Commercial Centre* designation. This shows that the City is willing to allow exceptions. In our opinion, the proposed density of 172 units per hectare is appropriate as the development is compatible (it can co-exist without unacceptable adverse impact) and it supports the City's and Province's higher order policies regarding intensification, transportation and housing choice. High-quality architecture and built form have been incorporated in the building design to make it compatible and the design addresses issues such as parking, common amenity space, angular plane, landscaping, and shadowing. The design satisfies the general intent of the City's urban design objectives for this site (see Urban Design and Sustainability Brief) which can be refined at the Site Plan Control stage.

The proposed 8 storey mixed-use development conforms to the applicable *Neighbourhood Commercial Centre* policies with the requested site-specific Official Plan Amendment to permit a maximum height of 8 storeys.

**c. Recent Development Proposals along Gordon Street
(also see Urban Design and Sustainability Brief)**

- i. Immediately adjacent to the north eastern side of the subject property along Arkell Road, lands municipally known as 33 and 37 Arkell Road and 1408 Gordon Street have been proposed for a six-storey mixed-use building, with a maximum density of 115 units per hectare and an FSI of 1.3.
- ii. Approximately 400 metres northwest of the subject property, a site-specific zoning amendment application has been filed to develop a 12 storeys apartment building on the properties municipally known as 1242-1260 Gordon Street and 9 Valley Road. The proposed development has a density of 271 units per hectare and an FSI of 3.59.
- iii. Approximately 2 kilometers north of the subject property, lands municipally known as 1871 and 1879 Gordon Street have been proposed for a six-storey apartment building consisting of 43 units. A Zoning By-law Amendment application has been filed to change the zoning of the lands from “Agricultural” (A) to a specialized “High Density Apartment” Zone with site-specific provisions. The proposed development has a density of 130 units per hectare and an FSI of 1.26.

The above active development applications along Gordon Street reflect how Gordon Street is evolving with redevelopment and intensification interest, that will implement the vision for the Gordon Street Intensification Corridor.

d. Planning Analysis and Justification

Intensification

As noted in our August 2019 Planning Justification Report, the proposed mixed-use development is appropriate and desirable. It is in keeping with the intensification and redevelopment objectives set out by the Provincial Policy Statement (2020), the Growth Plan for the Greater Golden Horseshoe (2019), and the City of Guelph Official Plan.

The proposed development supports a more intensified and efficient use of underutilized lands and provides a better range and mix of housing supply. In addition, the proposed development supports a complete community by providing additional rental housing units and retail services in a location served by public transit, existing and planned municipal infrastructure, and community facilities. The proposed development meets the Official Plan’s objectives of intensifying Gordon Street by offering a higher density development along an intensification corridor. Therefore, in our opinion, the applications and proposed development with an optimized density represent good planning practice and consistency with the policy framework in promoting appropriate intensification.

Land Use Compatibility

The proposed development retains previously submitted residential and commercial uses. These uses are permitted uses in the *Neighbourhood Commercial Centre* designation. One of the

Neighbourhood Commercial Centre's objectives is to establish local convenience and neighbourhood commercial uses within convenient walking distance of residential areas. The proposed development maintains this objective by providing retail services to the surrounding residential area. Furthermore, the proposed retail use on the ground floor will enhance the public realm along Gordon Street, and the upper floor residential use will provide additional housing opportunities within the area.

The requested ZBA adds the permitted use of Restaurant, Tavern. This has been added in order to accommodate the client's proposal to operate a neighbourhood brew pub, with an approximate accessory floor area for the micro-brewery system of 5.5 sq m which is the smallest available system. This use and all commercial uses permitted by the requested rezoning have a total cap of 425 square metres which is less than the standard NC Zone's provision of 625 sq m per commercial unit and hence the commercial component will not be a significant noise or traffic generator.

The surrounding lands are also designated *Neighbourhood Commercial Centre*. The proposed development is compatible with the surrounding land uses and presents no negative impacts to the low-rise residential neighbourhoods further to the northeast and southeast. Currently, there is a seven-storey building directly adjacent to the northwest and five and six-storey apartment buildings further northwest along Gordon Street. Similarly, there are four-storey townhouses to the northeast along Arkell Road and southeast along Gordon Street. The proposed development, located at the intersection of two arterial roads, is desirable and complementary to the existing buildings in the surrounding.

The proposed building is also compatible with the existing built form, height, and massing of the neighborhood's surroundings context. It also complements the current and emerging building character along Gordon Street. It provides an appropriate transition to the surrounding properties by providing appropriate setbacks, angular planes and ensuring an acceptable sky view to the surrounding properties.

Built Form and Density

As noted above, the proposed development contemplates a built form compatible with the surrounding neighbourhood and provides appropriate transition through proper building height, massing, layout, and orientation. The proposed building incorporates an appropriate setback and step back to provide a street wall along Gordon Street. The street wall and retail use at grade will enhance the pedestrian environment along the street and the broader public realm in general.

The requested zoning caps the height, total GFA and commercial GFA, and number of dwelling units in accordance with the design. Relief is sought to recognize a reduced interior side yard which is acceptable given proposed building setbacks of the development to the northeast. Indeed, their design has been developed to recognize the subject proposed development. The proposed development generally complies with the angular plane regulations and one minor increase in angular plane from 45 to 47 degrees for Arkell Road is proposed and will have no significant impact. Due to the proposed irregular configuration/shape of the landscaping along

Gordon Street which arises due to site constraints and a turning lane at the intersection, it is believed that this matter is better regulated by Site Plan Control and a zero requirement has been requested in the zoning for flexibility. Parking provisions for resident visitors and for the Restaurant, Tavern have been reduced based on the Parking Study which will further encourage public transit and active transportation.

The building is step-backed at levels 3 and 8 to maintain the required 45 degree angular plane (except for a 2 degree variation from Arkell Road) and provides visual relief to building mass. The building is angled parallel to the sight line triangle at the corner of Arkell Road and Gordon Street to enhance the main entrance to the commercial space and the overall appearance of the building.

From a density perspective, it is our opinion that the proposed density of approximately 172 units per hectare, is appropriate and desirable for the proposed development. It optimizes density on lands located along the intensification corridor close to transit services, existing and planned municipal infrastructure, and community facilities. Further, the proposed building contemplates a suitable built form to minimize any adverse impacts on adjacent land uses as discussed above.

Section 10.7 of the Official Plan considers allowing increased height and density bonusing if the development proposal is consistent with the Official Plan's goals and objectives, is compatible with the surrounding area, and includes provisions for community benefits. As discussed above, including under the discussion of the City's Official Plan, the proposed development keeps the intent of the Official Plan policies to promote higher density developments along the intensification corridor, provides appropriate transitions and compatible built form, and includes community benefits. Specifically, the inclusion of rental and accessible units and certain sustainability features which will be further reviewed, offer community benefits and present a considerable basis for allowing increased height (and the density proposed). Technically, bonusing would only apply to the requested increase in height as no Official Plan density cap applies; however, the requested OPA amends the height without relying on the bonusing policies. Community benefits can be added to the draft ZBA should the City not wish to secure them through undertakings/the site plan stage.

Range and Mix of Housing Options

The Provincial Policies and City's Official Plan have a number of policies that encourage developments with a range and mix of housing options to meet the needs of current and future residents. As noted above, the proposed development provides a range and mix of housing supply comprised of studio, one-bedroom, two-bedroom, and three-bedroom units and all the units are proposed to be rental units. The proposed mix and tenure of units will contribute to a diverse housing choice.

Response to City Staff/Public Comments

The revised amendments and development proposal were developed by carefully considering the comments/concerns received from City Staff, Councillors and the community. The following is a summary of our responses as incorporated in the revised development proposal:

- The proposed density and height are appropriate and desirable considering the existing and planned context of Gordon Street. As an intensification corridor, Gordon Street is evolving with higher density developments due to the availability of transit, existing and planned municipal infrastructure, and community services and facilities.
- The building is designed with appropriate setbacks and step backs to provide a transition to the surrounding by maintaining the angular planes with minor encroachments and reducing the mass and shadow impacts.
- The proposed development presents a considerable basis for allowing height (and density) bonusing based on its consistency with the Official Plan and community benefit provisions.
- The building design has been revised to provide an appropriate street wall, setbacks, and orientation to enhance the street intersection. These design features will promote the pedestrian environment and provide additional animation for the street.
- Detailed site plan and elevations will be prepared during the site plan process at a later date. However, the revised proposal has incorporated the comments related to design elements, glazing, wrap around balconies, and entrance highlighting.
- The total landscaping area has been increased to 33% from the previously proposed 22%. Similarly, the previously proposed common amenity area of 189 m² has been increased to 2,505 m². Amenity areas are located appropriately along with landscaping areas to maximize their use and limit the noise impact.
- It is recognized that the Environmental Assessment for the planned improvements to the Gordon Street right-of-way has not been finalized yet. However, the proposed development maintains the currently planned right-of-way and incorporates traffic comments in the revised site plan.

4. Updated Supporting Studies

a. Urban Design and Sustainability Brief

Weston Consulting has provided an Urban Design and Sustainability Brief regarding the revised design. Part 1 of the Brief examines the site's physical context and policy context, and establishes site specific goals and objectives. Part 2 describes the proposed development concept and how the project responds to the goals and objectives established in Part 1. This includes discussions of the site design, built form, integration with the public realm, and sustainable urban design. Reference should be made to this Brief when reading this Addendum Report as it provides detailed information, including graphics, regarding the surrounding land uses and context of the subject site. The Brief concludes that the revised design is in compliance with urban design policies of the City Official Plan and the design recommendations of relevant urban design documents. It concludes that that requested amendments will render a project that will contribute to implementing the vision for the Gordon Street Intensification Corridor.

b. Shadow Diagrams

SRM Architects has prepared Shadow Studies in support of the proposed development to demonstrate that the proposed building's height and location are compatible with and do not cause excessive shade on the surrounding neighbourhood, including residential use, retail stores, and public parks. The shadow study included all required test times on April 21, June 21, September 21, and December 21. The Studies demonstrate that the proposed development will cast a partial shadow on the adjacent property on Arkell Road but will be in full sunlight for most of the days indicated above and for the times of day when adjacent outside amenity area would likely be in use. The Studies conclude that the proposed development would generally not have a negative effect on the existing neighbourhood.

c. Phase 1 ESA

G2S Consulting Inc. was retained to complete a Phase One Environmental Site Assessment (ESA) Update for the subject property. The purpose of the Phase One ESA Update was to determine the potential for contamination on the subject property from present or past site activities or surrounding properties since the completion of the Phase One and Two ESAs in 2017 and 2019. The Phase One ESA identified contaminants of concern such as metals and petroleum hydrocarbons on the site due to its historical use as an autobody shop. The Report recommends undertaking a Phase Two ESA to investigate further identified contamination in soil and groundwater on-site and potential environmental impacts in soil and groundwater resulting from the identified potential environmental concern. As indicated in the Report, to facilitate the proposed mixed-use development, including residential use, a Phase Two ESA and a Record of Site Condition (RSC) will be required prior to redevelopment. The required Phase Two ESA and an RSC filling will be conducted later at the Site Plan Approval stage.

d. Transportation Impact Study Update

R.J. Burnside and Associates Ltd. have updated the previously submitted Transportation Impact Study (TIS) to include the revised development concept. The Study has also addressed the comments received from the City. The TIS analyzes the existing conditions, future traffic volumes, traffic operations, queue review, and transportation demand management and is based off full access movements for both the entrances to the site on Gordon Street and Arkell Road. The TIS identifies that future background traffic volume would exceed traffic capacity at the Gordon Street / Edinburgh Road South and Gordon Street / Arkell Road intersections. The majority of the capacity is due to background volumes and not site traffic and the study anticipates Gordon Street widening in the future. The TIS identifies no queue issues at both intersections. Further, the Study found the site design is appropriate to accommodate all modes of travel and recommends the proposed driveways for convenient access to the different land uses on-site, considering their limited conflicts with other driveways. Finally, the TIS concludes that the proposed development incorporates pedestrian and cyclist-friendly design elements to discourage dependency on the single-occupant motor vehicle.

e. Parking Review

R.J. Burnside has provided a Parking Review of the design's proposed residential and commercial parking in light of Zoning By-law's parking standards. The Review finds that the parking demand suggested by the zoning standards is overestimating future parking demand for the proposed development, based on the availability of transit, planned active transportation facilities, the nature of the proposed development as a neighbourhood commercial centre, and the proposed TDM measures that will further reduce parking demand. The Review concludes that the proposed parking supply of 159 spaces for the site will meet future parking demand based on the following:

- A review of several parking utilization surveys of similar sites demonstrated a lower residents and visitors parking demand.
- Lower parking requirements in other municipalities for restaurant uses.
- Visitors parking and commercial / restaurant parking can be used interchangeably.
- Pedestrians and cyclists are well served by existing and future sidewalk, trail and bike lanes within the study area.
- The proposed development incorporates pedestrian and cyclist friendly design elements including bicycle storage to discourage dependency on the single-occupant motor vehicle.

f. Functional Servicing and Stormwater Management Report

WalterFedy was retained to prepare a Functional Servicing and Stormwater Management Report in support of the revised mixed-use development. The purpose of the Report is to identify how the development will be serviced, including water, sanitary, and storm connections to existing municipal infrastructure, and the report also reviews water balance issues. The Report concludes that the watermain on Arkeil Road has sufficient flow and pressure to provide domestic and fire servicing to the development within pressure and velocity ranges as required by the City. The Report also found that average annual runoff from the site will increase by approximately 14% without any mitigation. To match with the existing levels of infiltration and runoff, the Report has recommended a combination of an infiltration gallery and a lined reservoir or cistern. This will be given an appropriate consideration later with a more detailed design at the Site Plan application stage. The Report also identifies that the sanitary sewer on Gordon Street does not have sufficient capacity to accommodate sanitary drainage from the development until City capitably funded superpipe upgrades within Gordon Street are completed in 2024. The proposed building is anticipated to be constructed in 2024 and will match the availability of the sanitary sewer service to the proposed development. The draft ZBA provided with this resubmission includes a holding provision for the superpipe.

g. Landscape Plan

The Landscaping Plan prepared by MHBC has incorporated the comments from City Staff. As suggested, the landscaping along Gordon Street has reduced the hard landscaping area and included planter boxes. The planter boxes are provided along Arkeil Road as well. Landscaping is provided in front of the commercial entrance to articulate the corner intersection and provide a transition from the built environment. Landscaping along Gordon Street is supplied with a mix of deciduous trees and a continuous shrub bed to define and animate the walkway and enhance the

public realm. Parking spaces are screened and buffered by placing plantings along Gordon Street and the residential parking ramp. A vegetative roof is provided at different levels to help increase the landscaping area, soften the building facade, and break down the building mass. A provision has been included in the revised draft ZBA to require no landscape strip along Gordon Street due to the irregular shape of the landscape strip in the drawing and this matter is better regulated at the Site Plan application stage.

5. Conclusion

The revised applications for the proposed mixed-use residential development represent an opportunity to intensify an underutilized property and are consistent with/conform to the policy directions articulated in the Provincial Policy Statement, the Growth Plan, and the City of Guelph Official Plan. The proposed development will provide a broader mix of housing choice and affordability, including rental units, and access to transit services, thereby representing an appropriate and desirable form of transit-supportive intensification. Given the current and planned context of the Gordon Street Intensification Corridor, the subject lands are suitable to accommodate an optimized density and range of uses in a location well served by existing and planned municipal infrastructure and community services and facilities.

In summary, the proposed development and associated planning applications are based on good planning and urban design principles and are supported by applicable policies and the technical and supporting studies referenced herein. Most of the findings and discussions in our previous Planning Justification Report, submitted to the City in August 2019, are still relevant and applicable to the revised proposal. We believe that the proposed development is appropriate for the subject lands, is compatible with the surrounding context, is in public interest, represents good planning, and should be approved.

If you have any questions or require additional information regarding this addendum letter, please do not hesitate to contact the undersigned at extension 232 or Raj Lamichhane of our office at extension 330.

Yours truly,

Weston Consulting

Per:



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