



December 1, 2020

File No.: 18042

The City of Guelph
Planning and Building Services
1 Carden Street, 3rd Floor
Guelph, ON N1H 3A1

Attention: Ms. Lindsay Sulatycki, MCIP, RPP
Senior Development Planner

Re: 2689865 Ontario Limited
166 and 178 College Avenue West, Guelph
Official Plan Amendment and Zoning By-law Amendment Applications (OZS-19-010)
– Planning Justification Addendum

Dear Ms. Sulatycki:

On behalf of our client, 2689865 Ontario Limited, please find below a planning justification addendum to our Planning Justification Report dated August 2019 as it relates to the Official Plan and Zoning By-law Amendment Applications (the “Proposed Applications”) for 166 and 178 College Avenue West in Guelph.

The proposed Official Plan Amendment would redesignate the Site from Medium Density Residential and Low Density Residential to High Density Residential with a site-specific policy to permit an increase in density and permit a seniors day use. The proposed Zoning By-law Amendment would rezone the Site from Specialized General Apartment (R.4A-5) Zone and Single Detached Dwellings (R.1B) Zone to Specialized High Density Apartment Zone (R.4B-XX). The below includes a list of the site-specific regulations required to implement the Proposed Development, a 6 storey multiple residential building with a ground floor community use (seniors day use or day care centre).

- A seniors day use and day care centre shall be permitted uses.
- The maximum density shall be 171 units per hectare.
- The maximum building height shall be 6 storeys.
- The minimum landscaped open space shall be 32% of the lot area (2078 m²).
- A minimum number of 133 parking spaces shall be provided.

- The maximum floor space index shall be 1.64.

The Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe have been updated since our initial submission in August 2019. As such, please find below justification related to the Provincial Policy Statement and Growth Plan.

Provincial Policy Statement (2020)

The Provincial Policy Statement (PPS), issued under the Planning Act with the latest version coming into effect on May 1, 2020, replacing the Provincial Policy Statement issued on April 30, 2014. The below PPS policies are relevant to the Site and the Proposed Applications:

1.1.1 Healthy, liveable and safe communities are sustained by:

- Policy 1.1.1 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;*

Response: The Proposed Applications will facilitate multiple residential housing and a community use (daycare or seniors day use). The multiple residential building will contribute to the mix of housing types available along College Avenue West and within the City of Guelph. The community use will support future residents on the Site and the adjacent neighbourhood by contributing to the mix of uses available.

- Policy 1.1.1 e) *promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs;*

Response: The Proposed Applications will provide for transit-supportive, pedestrian and cyclist friendly development with proximity to employment, institutional, commercial and recreational uses. The Proposed Applications will facilitate intensification of the Site and will make use of existing and planned services, providing for logical and cost-effect development.

- Policy 1.1.3.2 states that *land use patterns within settlement areas shall be based on densities and a mix of land uses which:*

- a) *efficiently use land and resources;*
- b) *are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available, and avoid the need for their unjustified and/or uneconomical expansion;*
- c) *minimize negative impacts to air quality and climate change, and promote energy efficiency;*
- e) *support active transportation;*
- f) *are transit-supportive, where transit is planned, exists or may be developed;*

Land use patterns within settlement areas shall also be based on a range of uses and opportunities for intensification and redevelopment in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.

Response: The Proposed Applications will contribute to the mix of land uses available within the immediately surrounding area (i.e. high density residential). The Proposed Applications will provide for an efficient use of land through increased density and will utilize existing municipal services. The Proposed Applications will facilitate development that will make use of existing and planned transit infrastructure and cycling infrastructure and in turn support active modes of transportation and community connectivity.

- *Policy 1.1.3.3: Planning authorities shall identify appropriate locations and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment where this can be accommodated taking into account existing building stock or areas, including brownfield sites, and the availability of suitable existing or planned infrastructure and public service facilities required to accommodate projected needs.*

Response: The Proposed Applications will provide intensification in an appropriate location, along an arterial road with proximity to institutional, commercial and recreational uses. The Proposed Applications will facilitate multiple-residential housing which will contribute to the mix of housing choice in the area on existing infrastructure.

- *Policy 1.1.3.4: Appropriate development standards should be promoted which facilitate intensification, redevelopment and compact form, while avoiding or mitigating risks to public health and safety.*

Response: Appropriate development standards have been incorporated into the proposed development concept such as suitable front, side and rear yard setbacks, common amenity area and off-street parking which will facilitate intensification and a

compact form. There are no public health or safety risks anticipated as a result of the Proposed Applications.

- Policy 1.4.3: *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area by:*
 - b) *permitting and facilitating:*
 1. *all housing options required to meet the social, health, economic and well-being requirements for current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and*
 2. *all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;*
 - c) *directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;*
 - d) *Promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;*
 - e) *Requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and*
 - f) *Establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.*

Response: The Proposed Applications are consistent with the above noted policies and will assist the City in providing for a range and mix of housing options. They will provide for residential intensification including additional residential units, will provide for new housing at a density which efficiently uses land and infrastructure. The Proposed Applications will facilitate development in proximity to public and active transportation options.

- Policy 1.5.1: *Healthy, active communities should be promoted by:*

- a) *Planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity;*

Response: The Proposed Development will enhance the streetscape of College Avenue West through a modern building design with elements that echo design elements and materials from the surrounding neighbourhood, street facing townhouse units that activate the street and enhanced landscape design.

Growth Plan for the Greater Golden Horseshoe

The Growth Plan for the Greater Golden Horseshoe came into effect on May 16, 2019 with Amendment 1 (2020) coming into effect on August 28, 2020. The Growth Plan supports the development of complete communities that are compact, transit-supportive and make efficient use of infrastructure and public service facilities. All decisions need to conform to the Growth Plan.

The Growth Plan provides an overall growth strategy for the Greater Golden Horseshoe region the complements the Provincial Policy Statement and is implemented by municipal planning documents. At the core of the Growth Plan are guiding principles for building compact, vibrant and complete communities; planning and managing growth to support a strong, competitive economy; and optimizing the use of existing or planned infrastructure to support growth in a compact and efficient form.

Policies for managing growth are contained in Section 2.2 of the Growth Plan. The following policies are applicable to the Proposed Applications:

- *2.2.1.2 forecasted growth to the horizon of this Plan will be allocated based on the following:*
 - a) *the vast majority of growth will be directed to settlement areas that:*
 - i. *have a delineated built boundary;*
 - ii. *have existing or planned municipal water and wastewater systems;*
 - and*
 - iii. *can support the achievement of complete communities;*
 - b) *within settlement areas, growth will be focused in:*
 - i. *delineated built-up areas;*

Response: The Proposed Applications will facilitate development within the Built-Up Area which is where growth is to be directed.

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

- a) *feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;*
- b) *improve social equity and overall quality of life, including human health, for people of all ages, abilities and incomes;*
- c) *provide a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*
- d) *expand convenient access to:*
 - i. *a range of transportation options, including options for the safe, comfortable and convenient use of active transportation;*
- e) *provide for a more compact built form and a vibrant public realm, including public open spaces;*

Response: The Proposed Applications will provide housing in close proximity to public transportation, public service facilities and open space. In addition, the Proposed Applications will facilitate development that will contribute to a vibrant and active public realm along College Avenue West. The guiding principles of the Growth Plan speak to the achievement of complete communities that meet the needs of residents for daily living. The Proposed Applications will facilitate development that provides housing within proximity to commercial, recreational and institutional amenities, meeting the intent of the Growth Plan which is to provide for the basic needs of all residents in a community. A community use is also proposed which will contribute to the mix of uses on the Site and within the immediate neighbourhood.

Policy 2.2.2.1 a) of the Growth Plan states that by the time the next municipal comprehensive review is approved and in effect, and for each year after, 50 percent of all residential development occurring annually within Guelph will be within the delineated built-up area.

Section 2.2.2.3 of the Growth Plan states that “*all municipalities will develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will:*

- c) *encourage intensification generally throughout the delineated built-up area;*
- d) *ensure lands are zoned and development is designed in a manner that supports the achievement of complete communities;*

Response: The Proposed Applications will assist the City of Guelph in achieving and/or exceeding their minimum intensification targets for the built-up area. The Proposed Applications will facilitate a multiple residential building with a community use (day care or seniors day use), providing opportunities for those to live within proximity to institutional, commercial, open space and commercial uses and thereby supporting/contributing to the achievement of a complete community.

Section 2.2.6 of the Growth Plan speaks to housing. The following policies are applicable to the Proposed Applications:

1. *Upper- and single-tier municipalities, in consultation with lower-tier municipalities, the Province, and other appropriate stakeholders, will:*
 - a) *Support housing choice through the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan by:*
 - i. *Identifying a diverse range and mix of housing options and densities, including additional residential units and affordable housing to meet projected needs of current and future residents; and*
 - ii. *establishing targets for affordable ownership housing and rental housing;*

Policy 2.2.6.3 states that to support the achievement of complete communities, municipalities will consider the use of available tools to require that multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes.

Response: The Proposed Applications will facilitate the development of rental multiple residential housing with a variety of unit sizes which will contribute to the mix of unit sizes available, for different sized households and incomes. The breakdown in terms of number and size of units are as follows:

- 5 – Studios (469 m²)
- 27 - 1 Bedroom (504 m², 508 m², 515 m², 522 m², 542 m²)
- 26 – 1 Bedroom + den (542 m², 563 m², 565 m², 597 m², 697 m², 708 m², 709 m²)
- 45 – 2 Bedrooms (562 m², 558 m², 586 m², 619 m², 622 m², 657 m², 670 m², 677 m², 676 m², 728 m², 763 m², 757 m², 768 m², 779 m², 796 m², 840 m², 867 m², 887 m², 880 m², 888 m², 916 m², 917 m², 925 m², 988 m²)

- 7 – 3 Bedrooms (938 m², 999 m², 1001 m², 1050 m²)

In summary, it is our opinion that the Proposed Applications are consistent with the Provincial Policy Statement as they will contribute to the mix of residential and community uses available within the neighbourhood and the City of Guelph. The Proposed Applications will facilitate development that makes use of existing and planned services. It is our opinion that the Proposed Applications conform to the Growth Plan for the Greater Golden Horseshoe as they will facilitate development within the Built-Up Area, will contribute to the housing supply and choice within the City of Guelph and will contribute to a complete community. The Proposed Applications will facilitate development that provides housing within proximity to commercial, recreational and institutional uses, meeting the intent of the Growth Plan which is to provide for the basic needs of all residents in a community.

Should you have any questions or require any additional information, please do not hesitate to contact Hugh Handy or myself.

Yours truly,

GSP Group Inc.



Sarah Code, MCIP, RPP
Associate – Senior Planner

cc. Mr. Sayf Hassan, 2689865 Ontario Limited
Mr. Eli Turkienicz, 2689865 Ontario Limited