

Planning Justification Report

210-222 College Avenue East, Guelph

EM Guelph Developments Limited Partnership

City of Guelph

Official Plan Amendment
Zoning By-law Amendment

January 2026



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1. Introduction

1.1 Overview

GSP Group (“**GSP**”) has been retained by EM Guelph Developments Limited Partnership. (the “**Client**” / “**Ownership**”) as the Planning Consultants to prepare a Planning Justification Report (“**PJR**”) in support of an Official Plan Amendment (“**OPA**”) and Zoning By-law Amendment (“**ZBA**”) (the “**Subject Applications**”) for the properties municipally known as 210-222 College Avenue East, Guelph (the “**Site/ Subject Property**”). It should be noted that EM Guelph Developments Limited Partnership is currently under contract to purchase the Site with the respective landowners of 210, 214, and 222 College Avenue East.

The Site is within the “Settlement Area Boundary” and “Built-up Area” in Schedule 1a of the City of Guelph Official Plan (**Figure 10**) and is designated “Low Density Residential” in Schedule 2 of the City of Guelph Official Plan (**Figure 11**).

The Site is currently zoned “Low Density Residential 1, Holding Symbol 1” (RL.1(H1)) (210 and 222 College Avenue East) and “Low Density Residential 1” (RL.1) (214 College Avenue East) as per Schedule A, Map 39, in the City of Guelph Zoning By-law (2023)-20790 (**Figure 14**). City Engineering staff have advised that the Holding Symbol on 210 College Avenue East was removed in January 2025, but it has not yet been reflected within the current consolidated Zoning By-law.

The Site is proposed to be redeveloped with a 10-storey, 153-unit purpose-built post-secondary residence development with 65 parking spaces and 2,477 sq.m of common amenity areas (“Proposed Development”).

To facilitate the construction of the Proposed Development, the Subject Applications request:

- An OPA to redesignate the Site from “Low Density Residential” to “High Density Residential” with a Site-Specific Policy to increase the maximum density to 425 units per net hectare for a Post-Secondary School Residence; and
- A ZBA to remove the Holding Symbol 1 on 222 College Avenue East and rezone the Site from “Low Density Residential 1” (RL.1) to “High Density Residential 7” (RH.7-XX), with site-specific provisions relating to the: use, density, setbacks, angular plane, landscape buffer, floorplates, tower separation, stair/ ramp

setbacks, active entrances, common amenity area, parking stall sizes, parking setbacks and parking rates.

1.2 Background

A Development Review Committee (“**DRC**”) Pre-Consultation Meeting for the Subject Applications was held on August 13th, 2025, with the City. A Record of DRC Pre-consultation Summary and Checklist was provided from the City on September 4th, 2025. The Pre-Consultation comments listed a PJR as a requirement of a complete application. This PJR has been prepared in support of the Subject Applications and should be read in conjunction with the other associated studies prepared in support of the OPA and ZBA.

The purpose of this PJR is to provide:

- A description of the Site, its existing physical conditions and its current context within the surrounding community (**Section 2**);
- A description of the development concept (**Section 3**);
- An outline of the OPA (**Section 4.1**) and ZBA (**Section 4.2**);
- An overview of the relevant planning policies and regulations and a planning opinion and justification for the proposed applications (**Section 5**);
- A summary of the technical studies (**Section 6**);
- A Public Consultation Strategy (**Section 7**);
- A Community Energy Initiative (“CEI”) Analysis/ Energy Strategy Study (**Section 8**);
- An Affordable Housing Study (**Section 9**);
- Conclusions (**Section 10**); and,
- Case Studies for similar projects close to Universities can be found in **Appendix A**, a draft of the proposed OPA can be found in **Appendix B** and a draft of the proposed ZBA can be found in **Appendix C**.

1.3 Supporting Studies

As identified in the Pre-Consultation comments, the following technical reports have been prepared in support of the OPA and ZBA:

- Functional Servicing and Stormwater Management Report prepared by MTE Consultants Inc., dated January 2026;

- Tree Inventory and Preservation Plan Report prepared by Jackson Arboriculture Inc., dated December 2025;
- Phase I Environmental Site Assessment prepared by CVD Engineering, dated March 2025;
- Pedestrian Wind Comfort Assessment prepared by RWDI, dated January 2026;
- Noise and Vibration Impact Study prepared by RWDI, dated January 2026;
- Transportation Impact Study prepared by BA Consulting Group Ltd., dated January 2026;
- Urban Design Brief prepared by GSP Group Inc., dated January 2026;
- Energy Study prepared by EQ Building Performance, dated January 2026;
- Preliminary Scoped Hydrogeological Assessment prepared by CVD Engineering, dated January 2026; and
- Geotechnical Investigation prepared by CVD Engineering, dated January 2026.



Site Location

Source: Google Earth Aerial Imagery (2025)

Figure

1

2. Site Overview and Context

2.1 Site Location Description

For clarity and consistency when describing the Site context and location it is based on project north which aligns with the design layout and development plans.

The Site, an interior lot, is located on the north side of College Avenue East, is legally described as Part of Lot 5, Concession 2, Division 'G' City of Guelph as in ROS157850, ROS524942, & ROS666478 and is municipally addressed as 210-222 College Avenue East. The Site is approximately 0.382 hectares in area (pre road widening) and is rectangular shaped. The Site is bound by Cutten Fields Golf Course to the north and east, College Avenue East (arterial road) and the University of Guelph to the south and a low-density residential lot to the west.

The Site currently consists of three (3) single detached dwellings, covered by a variety of vegetation that includes a mix of coniferous and deciduous trees in varying conditions. It does not contain any protected or designated natural heritage features. Topographic data indicates that the Site has a slope with an elevation change of approximately four and a half metres (4.5 m), descending from the south corner to the north.

2.2 Surrounding Land Uses and Context

The Site is located in Ward 5, and is located east of Gordon Street (arterial road), and west of Victoria Road South (arterial road). The Site is surrounded by a mix of land uses within an 800-metre radius primarily consisting of major institutional (the University of Guelph), and the golf course (the Cutten Fields Golf Course). A visual analysis of the surrounding context is illustrated in **Figure 2**.

NORTH: Directly **north** of the Site is the Cutten Fields Golf Course. Further **north** is a Significant Natural Area that contains the Eramosa River and a range of trails specifically Radial Trail (private but open to public) connecting Guelph to the Limehouse Recreational Trail. Additionally, this trail connects to the Gosling bridge which connects the park network across the river (York Road Park, Eramosa River Park and Lyon Park) that run east and west.

EAST: To the **east**, the Site is bounded by the Cutten Fields staff and maintenance parking lot and golf course. Immediately beyond this lies a section of the University of Guelph Arboretum, which encompasses an extensive trail network, the Turfgrass Institute, the Morwick G360 Groundwater Research

Institute, and the R.J. Hilton Centre, a central facility for Arboretum grounds management and horticultural operations. The Arboretum's lands directly adjoin the intersection of College Avenue East and Victoria Road.

Further **east** on university lands are three (3) student residence buildings (Lambton Hall, Lennox/Addington Hall, and Watson Hall) as well as the Macdonald Institute. Additionally, the Art Gallery of Guelph is situated at the intersection of Gordon Street and College Avenue West.

SOUTH: Lands to the **south** of the Site form part of the University of Guelph's main campus, including the University Centre Bus Loop. The Gryphons Fields and the Gryphons Athletic Centre are located immediately **south** of the Site.

WEST: To the **west**, of the Site there is a two and a half storey single detached dwelling. Beyond this lies the Cutten Fields indoor recreation dome which abuts the University of Guelph's P19 Parking Lot, accommodating approximately 392 spaces reserved for yellow/compound permit holders.

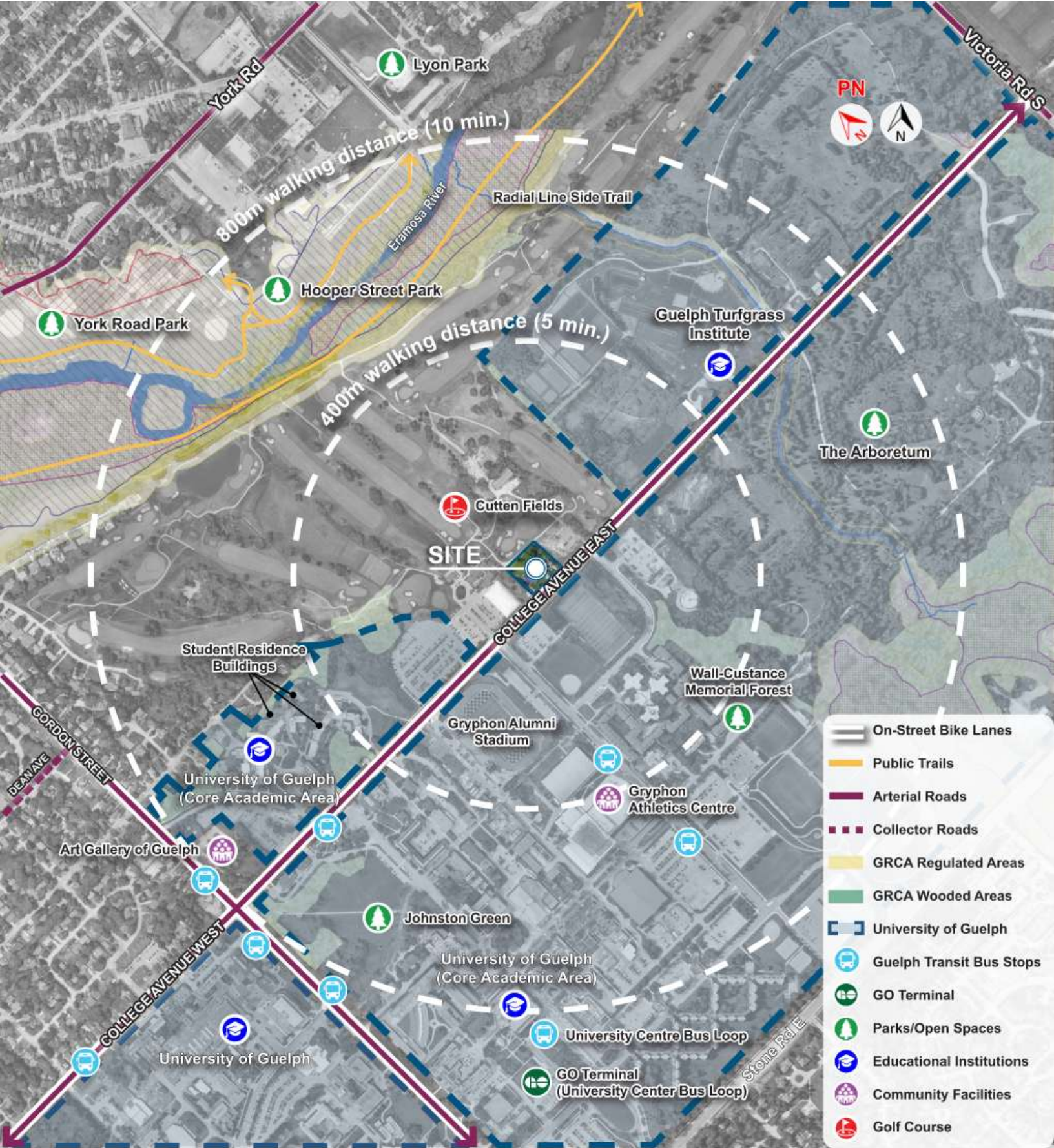
Vehicularly, the Site is bounded by an arterial road to the south (College Avenue East). College Avenue East has sidewalks on either side of its right-of-way directly adjacent to the Site and contains two lanes with a centre turning lane permitting left turns onto a private road for the University of Guelph better known as E Ring Road to the south. Additionally, College Avenue East provides bike lanes through paved shoulders connecting to a larger network of cycling.

The Site is well-served by active means of transportation. The Site is within proximity to the Guelph Transit Bus Route 15 College, which provides connections to the University Centre. There are two bus stops within proximity to the Site: (College at MacDonald eastbound) loops just west of the subject Site with a stop located an eight (8) minute walk away to the west at the intersection of College Avenue East and Macdonald Street and five (5) minute walk to the south along E Ring Road.

University Centre Station is a primary transit hub on the University of Guelph's campus, located adjacent to the University Centre Building, it accommodates multiple Guelph Transit bus stops that converge to offer efficient connectivity; these includes routes 1-2,5-7,15,17-18, 50U, 52U, 56U, 58U and 99 (Mainline – connecting to the downtown). In addition to Guelph Transit this transit hub acts as a Major Bus Stop for Go Transit routes:

- 17 Connecting Waterloo, Guelph and Hamilton
- 29 Connecting Guelph, Mississauga and Toronto

- 31, 31a, 31b, 31c, 31m Connecting Guelph, Brampton and Toronto
- 33, 33c and 33f Connecting Guelph to North York, Georgetown and Mount Pleasant



2.3 Policy Context

The Site is currently designated in the City of Guelph Official Plan, February 2024 consolidation as “Settlement Area Boundary and Built-up Area” on Schedule 1a – Urban Structure and “Low Density Residential” on Schedule 2 – Land Use Plan.

The Site is currently zoned in the City of Guelph’s Zoning By-law No. (2023)-20790 as “Low Density Residential 1, Holding Symbol 1” (RL.1(H1)) (210 and 222 College Avenue East) and “Low Density Residential 1” (RL.1) (214 College Avenue East) as per Schedule A, Map 39. City Engineering staff have advised that the holding symbol on 210 College Avenue East was removed in January 2025, but it has not yet been reflected within the consolidated Zoning By-law.

The Site is not within the regulatory limits of the Grand River Conservation Authority (“**GRCA**”).

3. Proposed Development

The Proposed Development includes the redevelopment of the Site with **(Figure 3)**:

- A 10-storey, 153-unit purpose-built post-secondary school residence;
- Vehicular access on the east side of the Site with a loading space located along the east portion of the building to facilitate move-in/ move-out activities and waste collection;
- A primary pedestrian connection to the principal entrance of the building at the east end of the College Avenue East frontage. An additional pedestrian pathway runs north-south along the westerly side of the building connecting building exits and common amenity space to the public sidewalk.
- Underground parking that accommodates 65 spaces, accessible via the easterly drive aisle and an automatic overhead door. The first level includes 37 spaces- 13 visitor spaces (including two (2) visitor accessible spaces), two (2) standard accessible spaces, one (1) compact space, and 21 standard spaces. The second lower-level features 23 standard spaces and five (5) compact spaces **(Figure 4)**.
- 210 bicycle parking spaces - 194 long-term and 16 sort term. Long-term bicycle parking spaces will be located on the second lower level in a bicycle storage room. Short-term bicycle spaces will be located within close proximity to the principal building entrance in the form of outdoor bike racks.
- Outdoor and indoor common amenity areas **(Figures 5-6)**. The exterior common amenity areas include an amenity terrace located on level 10, an interior outdoor courtyard on level 1 and a passive amenity space along the westerly side of the Building. The indoor common amenity area includes multiple spaces on all levels of the building. All amenity areas will be maintained by the Owner of the Site.
- Mechanical and electrical rooms are located within the first level of parking and on the roof. A transformer that will service the building will be situated at the end of the drive aisle. Waste will be stored internally in a storage room where bins will be rolled out into the loading bay upon scheduled private pick-up.
- A private storm sewer system will be installed on-site to collect runoff from the drive aisle, connecting into the underground parking structure and pumping it to the municipal storm sewer for discharge into the right-of-way. The existing catchbasin fronting the Site will be replaced with a catchbasin manhole, into which the private system will connect via a new 300 mm storm sewer.

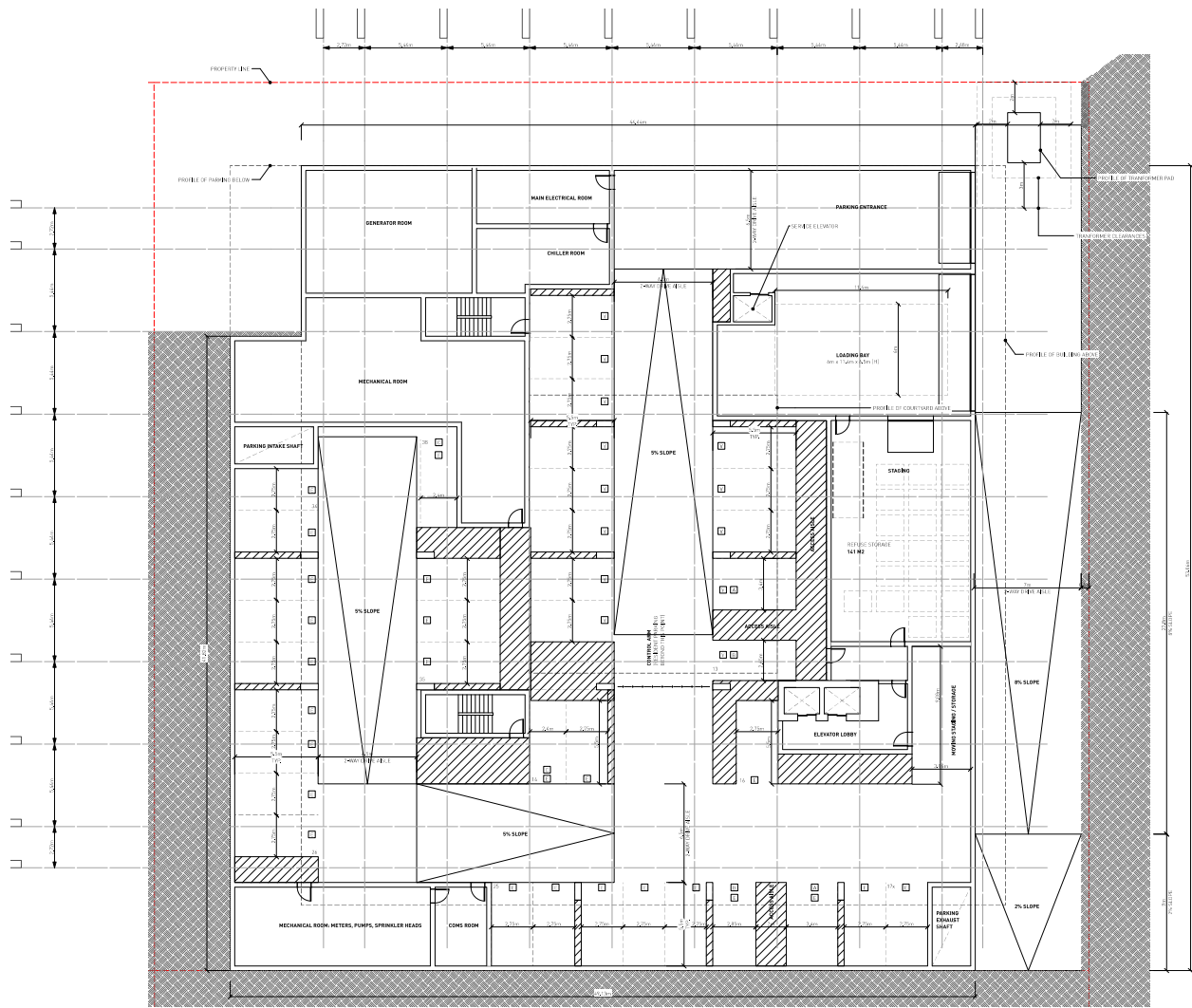
- The Proposed Development increases the Site imperviousness from 29.2% to 79.0%, reducing annual infiltration from 392 m³/year in pre-development conditions (based on clay loam soils with poor infiltration rates) to a net loss without mitigation. Mitigation involves an on-site infiltration gallery capturing 15 mm of runoff, yielding 462 m³/year infiltrated volume and a net gain of 103 m³/year, installed at least 1.0 m above high groundwater.
- A total of 31 trees and 1 tree unit, with two species at risk were identified: Kentucky Coffeetree (Trees 11 and 12) and eastern flowering dogwood (tree 30). Although these species fall under potential regulation by Ontario’s Endangered Species Act, 2007, via O. Reg. 832/21 and O.Reg. 230/08, neither applies here due to the City of Guelph’s location outside of the prescribed geographic ranges and natural habitats. The removal of 10 trees will be required to accommodate the Proposed Development all of which are within the Subject Property boundaries. Preservation of trees 1–7, 11, 12, 18–29, and 32 is feasible through stringent protection measures outlined in the arborist report.

The design of the Proposed Development is discussed in detail in the Urban Design Brief prepared by GSP Group.

Key statistics on the Proposed Development are summarized in **Table 1.0** below.

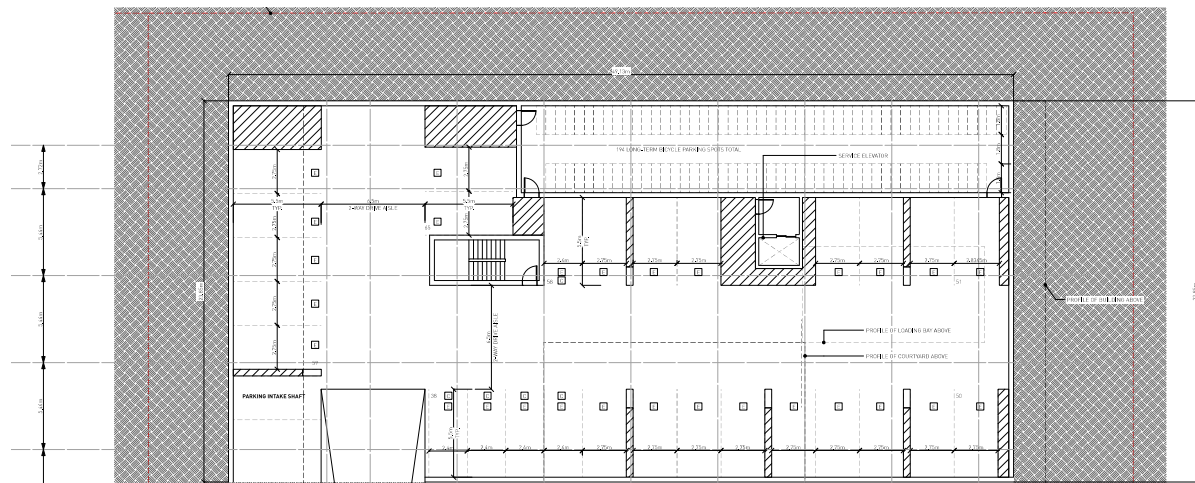
Table 1.0 Site Data Chart

Proposed Development Statistics	
Residential Type	High-density post-secondary school residence
Lot Area (Net)	3607.81 sq.m. +/-
Lot Frontage	61.60 m
Building Height	10 storeys
Common Amenity Area Proposed	16 sq.m. per dwelling unit
Landscape Open Space	40%



Parking Level One

Source: 5 4 6 7 8 9 6 Architecture Inc. - FP-1



Lower Parking Level

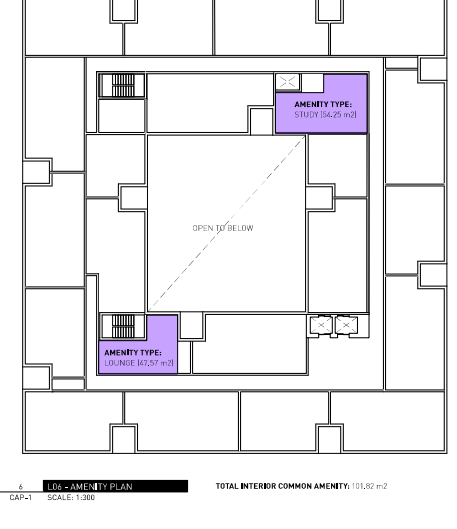
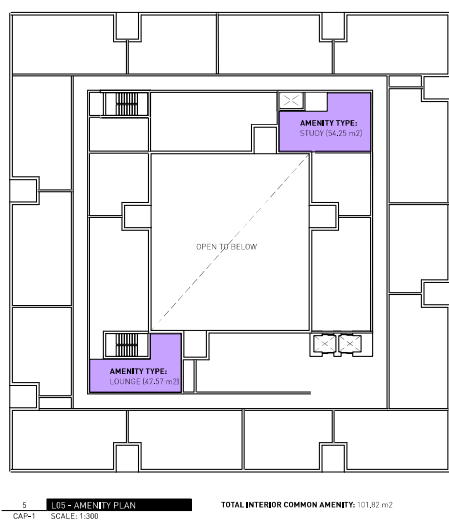
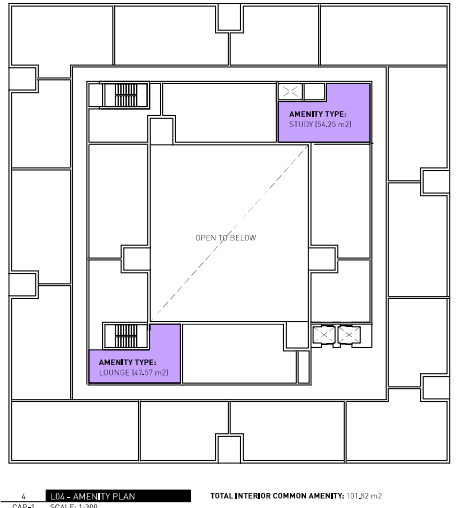
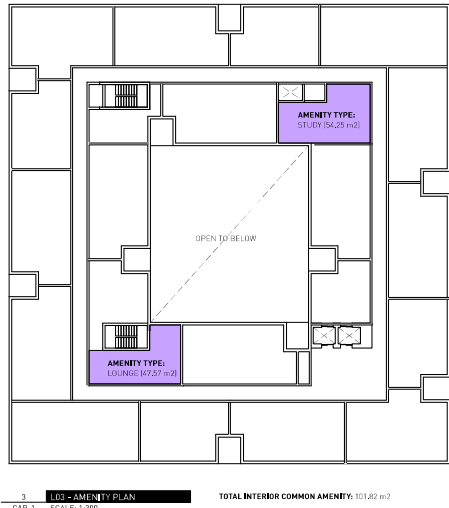
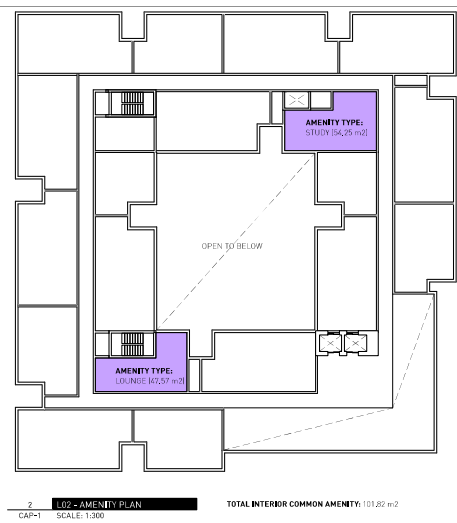
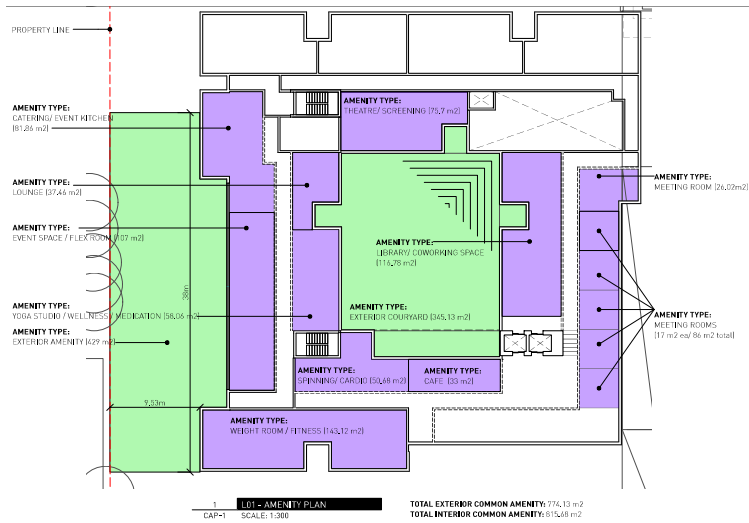
Source: 5 4 6 7 8 9 6 Architecture Inc. - FP-2



Floor Plans

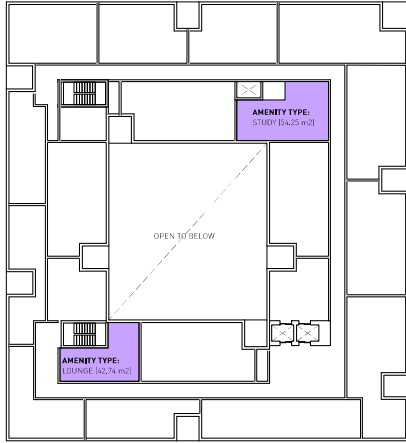
Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

Figure
4

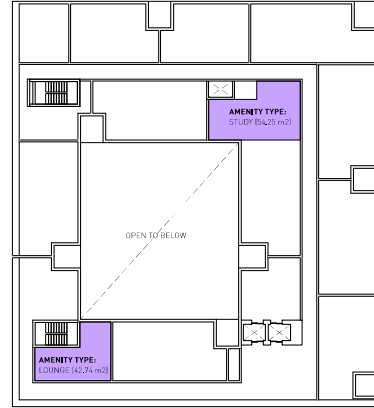


Common Amenity Areas
Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

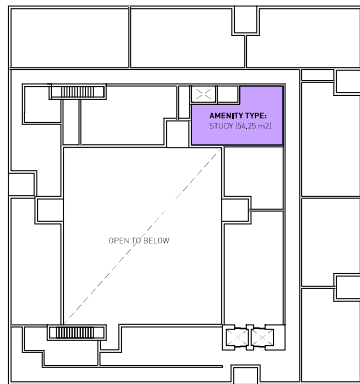
Figure
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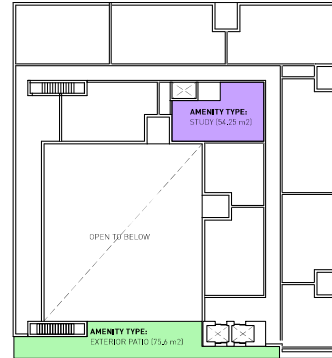
7 007 - AMENITY PLAN TOTAL INTERIOR COMMON AMENITY: 126.99 m2
CAP-1 SCALE: 1:300



8 008 - AMENITY PLAN TOTAL INTERIOR COMMON AMENITY: 126.99 m2
CAP-1 SCALE: 1:300



9 009 - AMENITY PLAN TOTAL INTERIOR COMMON AMENITY: 84.25 m2
CAP-1 SCALE: 1:300



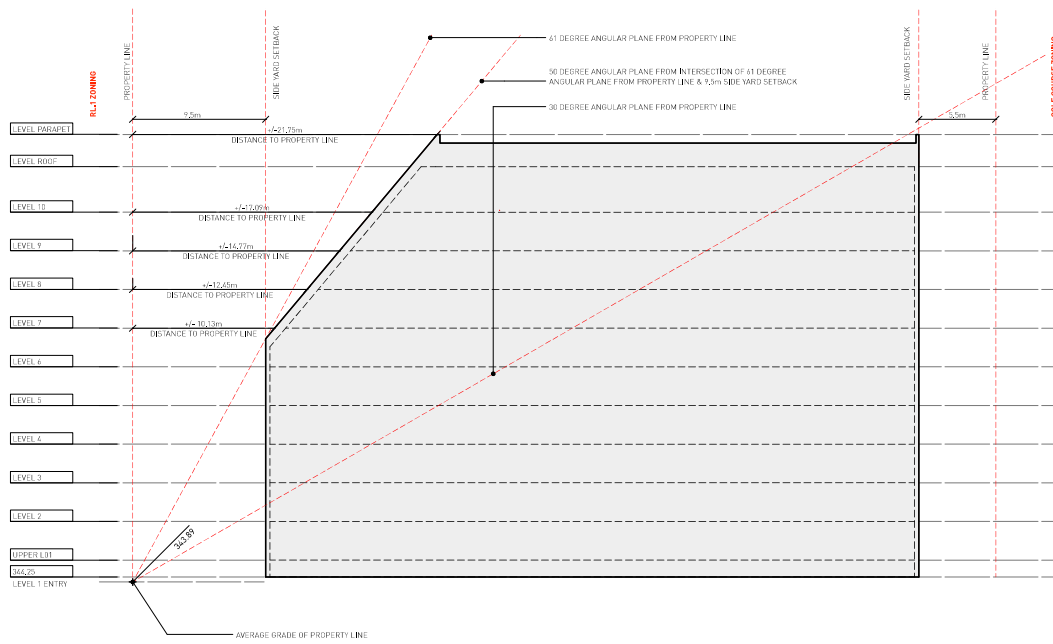
10 010 - AMENITY PLAN TOTAL EXTERIOR COMMON AMENITY: 73.6 m2
TOTAL INTERIOR COMMON AMENITY: 84.25 m2
CAP-1 SCALE: 1:300



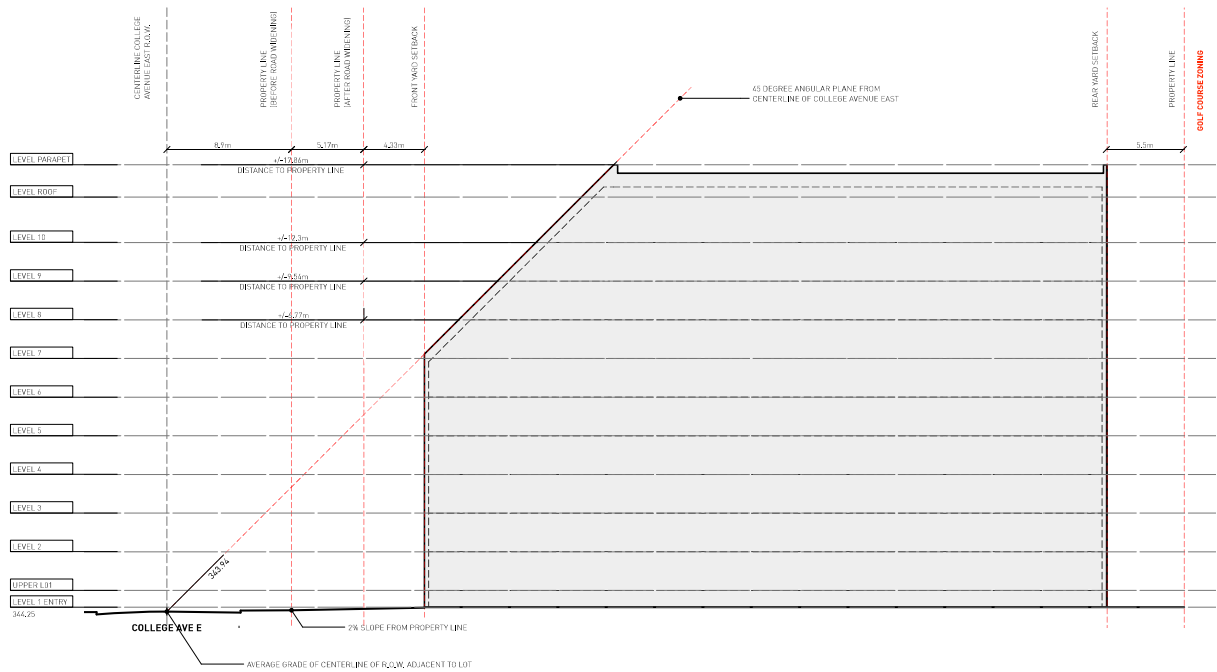
Common Amenity Areas

Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

Figure
6



1 ANGULAR PLANE DIAGRAM WEST / EAST
AP-1 SCALE: 1:200

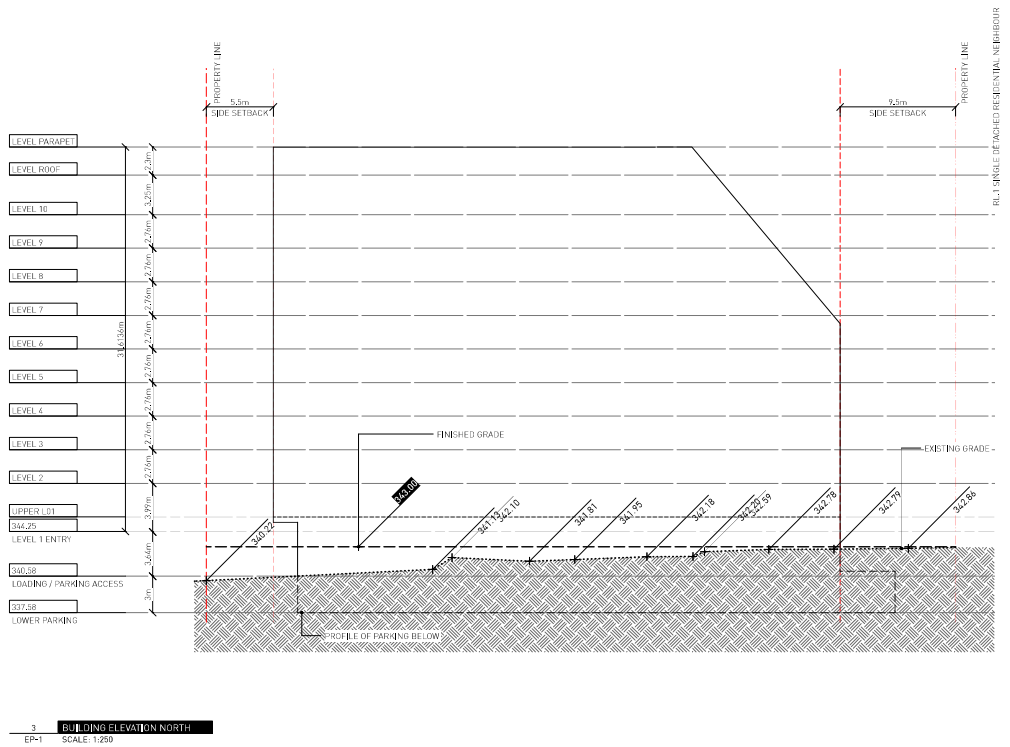
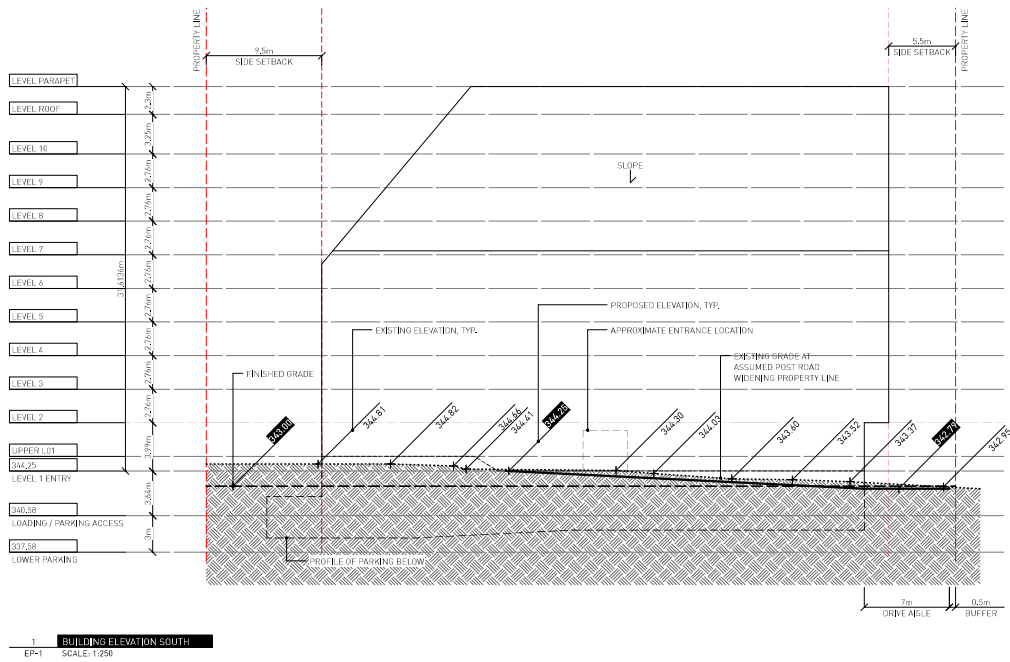


2 ANGULAR PLANE DIAGRAM NORTH / SOUTH
AP-1 SCALE: 1:200



Angular Planes
Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

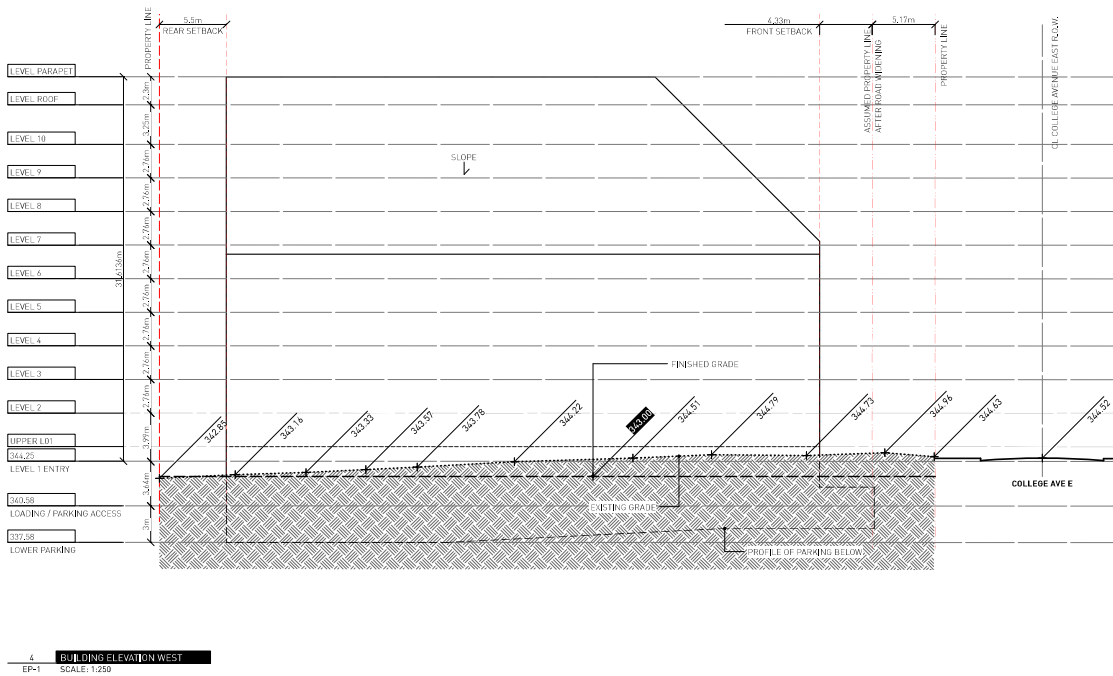
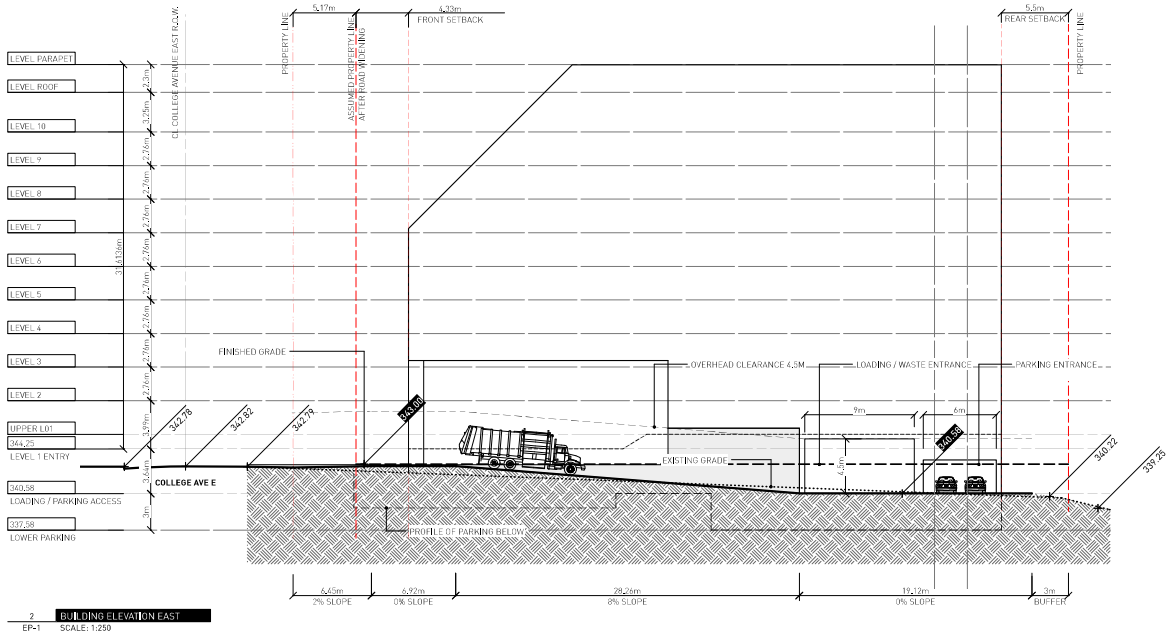
Figure
7



Elevations

Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

Figure
8



Elevations

Source: 5 4 6 7 8 9 6 Architecture Inc. (2026)

Figure
9

4. Planning Applications

4.1 Official Plan Amendment

The Site is currently designated in the City of Guelph Official Plan, February 2024 consolidation as:

- Within the “Settlement Area and Built-up Area” on Schedule 1a – Urban Structure (**Figure 10**);
- “Low Density Residential” on Schedule 2 – Land Use Plan (**Figure 11**);
- Within the “Wellhead Protection Area B” (WHPA-B) on Schedule 7a – Source Water Protection Wellhead: Protection Areas (**Figure 12**); and,
- Within the “Issue Contributing Areas for Nitrate and TCE” on Schedule 7b – Source Water Protection: Issue Contributing Areas (**Figure 13**).

The OPA is proposing to redesignate the Site from “Low Density Residential” to “High Density Residential”, including a site-specific policy to increase the maximum density to 425 units per net hectare.

An explanation and justification of the requested designation and site-specific policy can be found in **Section 5.3**.

4.2 Zoning By-law Amendment

The Site is currently zoned in the City of Guelph’s Zoning By-law No. (2023)-20790 as:

- “Low Density Residential 1”-RL.1 and “Low Density Residential 1- Holding Symbol 1”-RL.1(H1) on Map 39 (**Figure 14**).

The Site is not within the regulatory limits of the Grand River Conservation Authority (“**GRCA**”).

The ZBA proposes to rezone the Subject Property from an RL.1 and RL1(H1) zone to a RH.7-XX zone with site-specific provisions to:

- Permit a Post-Secondary School Residence as an additional permitted use which is defined as: “Post-Secondary School Residence” means the whole of an

apartment building consisting of dwelling units primarily intended for post-secondary school students;

- Increase the maximum density from 150 units per hectare to a maximum density of 425 units per hectare for a Post-Secondary School Residence;
- Reduce the minimum Front Yard Setback from 6 m to 4.3 m;
- Reduce the minimum Interior Side Yard Setback along east interior lot line from 7.5 m to 5.5 m;
- Permit a retaining wall 0.2 m from the east lot line and the rear lot line;
- Reduce the minimum rear yard setback from a minimum of 7.5 m to 5.5 m;
- Reduce the minimum buffer strip along east interior lot line from 3 m to 0.2 m;
- Permit a retaining wall and transformer within the required buffer strip along the rear lot line;
- Increase the maximum floorplate size from 1,200 sq.m for the 7th and 8th floor to 1,600 sq.m for the 7th storey and 1280 sq.m for the 8th storey and from 1,000 sq.m for each storey above the 8th floor to 1,100 sq.m for the 9th storey;
- Reduce the minimum building setback from 3 m for all portions of the building above the 6th storey facing a street for buildings located within 15 m of a street to 2.0 m for all portions of the building above the 7th storey facing a street for buildings located within 15 m of a street;
- Reduce the minimum active entrances required from one (1) active entrance for every 30 m of street line for the portion of the building facing the street (two required) to one (1);
- Reduce the minimum rear and interior side yard setback of the tower portion of a building from 12.5 m to 5.5 m from the east interior side lot line and 5.5 m for the rear lot line and 9.5 m for the west interior side lot line measured perpendicularly from the exterior wall of the 6th storey;
- Reduce the minimum common amenity area requirement from 20 sq.m per dwelling unit to 16 sq.m per dwelling unit;
- Increase the maximum angular plane adjacent to an RL.1 zone from 30 degrees to a maximum of 61 degrees;
- Permit a minimum parking size of 2.75 m x 5.5 m;
- Permit a drop off/ pick up parking space within the front yard setback (1.65 m from the front lot line) whereas no parking spaces are permitted in the front yard;
- Permit a driveway/ ramp setback from the building of 0 m whereas a minimum setback of 3 m is required adjacent to habitable rooms;

- Apply a minimum parking rate of 0.42 parking spaces per unit for a Post-Secondary School Residence. A minimum of 20% of the required parking spaces shall be for the use of visitor parking;
- Increase the maximum encroachment of exterior stairs from 1.5 m into the front yard and a minimum setback of 0.8 m from a front lot line to a maximum encroachment of 4.10 m into the front yard and a minimum front yard setback of 0.2 m; and
- Increase the reduce the minimum front yard setback for a barrier free access ramp from 0.8 m to a minimum of 0.1 m.

Accessible Parking Spaces, Visitor Parking Spaces and Electric Vehicle Parking Stalls will comply based on the amended parking ratio noted above.

An explanation and justification of the requested zone and site-specific provisions can be found in **Section 5.4**.

5. Planning Policy Framework and Analysis

The following section sets out and analyzes the relevant planning policy framework to assess the appropriateness of the proposed OPA and ZBA.

5.1 Planning Act

The *Planning Act R.S.O. 1990, c.P.13* (the “**Planning Act**”), consolidated October 20, 2024, serves as the foundational legislation governing land use planning in Ontario, providing a comprehensive framework that integrates provincial interests into planning decisions, outlines a transparent and efficient planning process, fosters cooperation among diverse stakeholders, and affirms the authority and accountability of planning authorities, thereby ensuring a balanced and effective approach to land use planning within the province.

Section 1.1 of the *Planning Act* outlines the purpose of the Act, which are:

- a. to promote sustainable economic development in a healthy and natural environment with the policy and by the means provided under this Act;
- b. to provide for a land use planning system led by provincial policy;
- c. to integrate matters of provincial interest in provincial and municipal planning decisions;

- d. to provide for planning processes that are fair by making them open, accessible, timely and efficient;
- e. to encourage co-operation and co-ordination among various interests; and
- f. to recognize the decision-making authority and accountability of municipal councils in planning.

5.1.1 Matters of Provincial Interest

Section 2 of the *Planning Act* outlines matters of provincial interest that various authorities, including the Minister, municipality, and Tribunal, must consider when carrying out their responsibilities under the Act. The relevance of these matters to the Proposed Development is discussed below in **Table 2.0**:

Table 2.0 Matters of Provincial Interest

<i>Planning Act, Section 2 Matters of Provincial Interest</i>		
No.	Policy	Assessment
(a)	the protection of ecological systems, including natural areas, features and functions;	The Site neither contains nor is it directly adjacent to any natural heritage systems, nor does it impede the protection of ecological systems.
(b)	the protection of the agricultural resources of the Province;	This development is in an urban area and does not impede protection of agricultural resources.
(c)	the conservation and management of natural resources and the mineral resource base;	This Proposed Development is in an urban area and does not negatively impact the conservation and management of natural resources and mineral resource base.
(d)	the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	The Site neither contains nor is it directly adjacent to any cultural heritage resources.
(e)	the supply, efficient use and conservation of energy and water;	The Proposed Development supports efficient water use, conservation of energy and water and utilizes existing municipal water and sanitary services.

Planning Act, Section 2 Matters of Provincial Interest		
No.	Policy	Assessment
(f)	the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The Proposed Development will optimize existing and available municipal servicing infrastructure, road networks, and communication infrastructure. The Transportation Impact Study concludes that travel demands generated by the Proposed Development can be acceptably accommodated, and the proposed on-site parking is appropriate to accommodate the needs of Site users.
(g)	the minimization of waste;	The Proposed Development intends to redevelop the Site and demolish the three (3) existing single detached dwellings. Opportunities for waste management, reclamation of unused recyclable building site material, and erosion control will be considered at the time of demolition. Wherever possible and feasible, local manufacturers or suppliers of construction materials will be sourced to reduce travel distance of material, and building materials containing recycled content will be considered where possible and feasible.
(h)	the orderly development of safe and healthy communities;	The Proposed Development supports the orderly creation of a safe and healthy community by providing purpose-built post-secondary student residence in a campus-adjacent, transit-supported location. The Site design includes secure access, indoor and outdoor amenity spaces, and landscaping that enhances the streetscape and provides visual separation from the adjacent low-density use. By concentrating a post-secondary student residence in a purpose-built building, the Development reduces pressure on surrounding neighbourhoods, promotes predictable

Planning Act, Section 2 Matters of Provincial Interest		
No.	Policy	Assessment
		and efficient growth, and provides students with opportunities for recreation, study, and social interaction in a safe and supportive environment.
(h.1)	the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	The Proposed Development will adhere to all requirements prescribed in the Accessibility for Ontarians with Disabilities Act, the Ontario Building Code, Section 4 of the City of Guelph's Urban Design Manual for Barrier Free Accessibility Standards and the City of Guelph Facility Design Manual (as applicable).
(i)	the adequate provision and distribution of educational, health, social, cultural and recreational facilities;	The Proposed Development is well-served by a range of educational, health, social, cultural, and recreational facilities via the University of Guelph. The Proposed Development will also provide a 2,477 sq.m. of common amenity area for its residents.
(j)	the adequate provision of a full range of housing, including affordable housing;	<p>The Proposed Development delivers 153 purpose-built student housing units, contributing to the provision of a full range of housing types, including rental housing that serves a distinct user group. Purpose-built student housing addresses a demonstrated housing need associated with the University of Guelph and functions differently from conventional apartment housing.</p> <p>Locating student housing immediately adjacent to the University of Guelph supports efficient land use, reduces reliance on low-density neighbourhoods for student accommodation, and helps relieve pressure on the broader housing stock. Ownership is also exploring</p>

Planning Act, Section 2 Matters of Provincial Interest		
No.	Policy	Assessment
		CMHC financing programs, which support the delivery of long-term, professionally managed student rental housing and aligns with provincial objectives related to housing supply and affordability.
(k)	the adequate provision of employment opportunities;	The Proposed Development does not negatively impact the City's ability to provide adequate employment opportunities.
(l)	the protection of the financial and economic well-being of the Province and its municipalities;	The Proposed Development optimizes existing municipal infrastructure and services, avoiding the need for unnecessary costly expansions.
(m)	the co-ordination of planning activities of public bodies;	This will be achieved through the review process outlined in the Planning Act, ensuring coordination with relevant public bodies.
(n)	the resolution of planning conflicts involving public and private interests;	To date, no conflicts involving private interests have been identified. Should any arise through the public process, the Owner will collaborate with relevant parties to assess and aim to resolve the issues.
(o)	the protection of public health and safety;	The Site will be designed to prioritize resident health and safety, as demonstrated through the Site Plan Approval and Building Permit process.
(p)	the appropriate location of growth and development;	The Subject Site represents an appropriate location for the proposed 10-storey, 153-unit purpose-built post-secondary student residence given its immediate proximity to the University of Guelph, frontage on College Avenue East (an arterial road), and access to a highly integrated transit network. Locating purpose-built student housing near the University responds to

Planning Act, Section 2 Matters of Provincial Interest		
No.	Policy	Assessment
		<p>demonstrated demand, reduces pressure on surrounding low-density neighbourhoods, and promotes efficient land use by supporting walking, cycling, and transit-oriented travel.</p> <p>As outlined in Appendix A, comparable developments are commonly located near post-secondary institutions and along arterial roads with strong transit service. This approach reflects a consistent planning practice that directs higher-density growth to areas supported by existing infrastructure and amenities. The Proposed Development aligns with this pattern by situating student housing within an education-focused area characterized by institutional uses, recreational facilities, and transit-supportive conditions.</p> <p>The University area functions as a key transit focal point within the City of Guelph, with University Centre Station serving approximately 13 of the City's 26 local transit routes. This level of transit access supports a higher density purpose-built student housing development with reduced automobile dependence, reinforcing the appropriateness of the Proposed Development in this location.</p>
(q)	the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The Proposed Development creates a pedestrian oriented environment that prioritizes safety, accessibility, and comfort through access to multiple bus routes, long-term and short-term bicycle parking on-site and safe sidewalk

Planning Act, Section 2 Matters of Provincial Interest		
No.	Policy	Assessment
		connections throughout the Site and to the public realm.
(r)	the promotion of built form that, <ul style="list-style-type: none"> i. is well-designed, ii. encourages a sense of place, and iii. provides for public spaces that are of high quality, safe, accessible, attractive and vibrant; 	The Proposed Development is well designed in an efficient manner to best utilize the Site while ensuring that the Proposed Development is visually appealing and addresses the frontage along College Avenue East creating a sense of place that is high-quality, safe, accessible, attractive, and vibrant.
(s)	the mitigation of greenhouse gas emissions and adaptation to a changing climate.	The Proposed Development will adhere to all requirements outlined in the Ontario Building Code, which includes sustainability measures relating to greenhouse gas emissions and adaptation to a changing climate.

In summary, the Proposed Development represents an efficient use of the Site by introducing higher-density, purpose-built student housing close to the University of Guelph. By providing additional student-oriented accommodation in an appropriate, institution-adjacent location, the development has the potential to help relieve pressure on the broader low-density housing supply by better aligning student demand with locations supported by transit and services.

This redevelopment makes efficient use of the Site and supports orderly growth by directing higher density purpose-built student housing to a location suited to accommodate it. In doing so, the Proposed Development contributes to broader planning objectives related to land use efficiency, housing diversity, and community stability, without introducing undue impacts on surrounding neighbourhoods or existing infrastructure.

5.1.2 Consistency with Policy Statements

Section 3(5) of the *Planning Act* requires that all decisions of municipal councils regarding the exercise of authority concerning planning matters “shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision” and “shall conform with the provincial plans that are in effect on that date, or shall not conflict

with them, as the case may be.” The Provincial Planning Statement is applicable and relevant with respect to the Subject Application. The Greenbelt Plan, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan and Metrolinx Act along with associated policy statements do not apply to the Site.

5.2 Provincial Planning Statement (2024)

The Provincial Planning Statement (“PPS”), issued under the *Planning Act* came into effect on October 20, 2024, provides direction on matters of provincial significance related to land use planning. Section 3(1) of the *Planning Act* requires that, all decisions affecting planning matters “shall be consistent with” the PPS.

The PPS provides direction on provincial interests and guiding growth and development in Ontario to achieve effective and efficient land use planning. The goals and intent of the PPS are centered around five key priorities: generating an appropriate housing supply, making land available for development, providing infrastructure to support development, balancing housing needs with resource protection, and effective implementation.

The following provides a summary of the applicable PPS policy consideration for the Site as well as justification for the Proposed Development in terms of these policies:

5.2.1 Building Homes, Sustaining Strong and Competitive Communities

Chapter 2: Buildings Homes, Sustaining Strong and Competitive Communities emphasizes providing a range and mix of housing options while directing growth to urban and rural settlement areas and strategic growth areas. Relevant policies include:

Section 2.1.4 states: *“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 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, including units in draft approved or registered plans.”*

Section 2.1.6 states: *“Planning authorities should support the achievement of complete communities by:*

- a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*
- b) *improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society;*

Response: In alignment with the principles of housing options as defined in the PPS, the Proposed Development enhances the surrounding community by providing a range of student housing options proximate to the University of Guelph’s central campus, thereby addressing both immediate and anticipated future demands. This includes introducing a high-density residential Site comprising a 153-unit student residence, which not only expands accommodation capacity but also fosters a more integrated and accessible neighbourhood fabric surrounding the existing University. By incorporating housing forms beyond the university-managed facilities and redirecting student housing pressures away from established local neighbourhoods this Proposed Development strategically promotes equitable resource distribution. The Proposed Development is appropriately sited proximate to the University of Guelph to the east, south and west, establishing an optimal spatial and functional linkage to its intended educational purpose, ensuring seamless connectivity and minimal disruption to broader community dynamics.

Section 2.2.1 of the PPS relates to housing. Policy 2.2.1 of the PPS states: *“Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*

a) *establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*

b) *permitting and facilitating:*

1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within*

previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;

c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and

d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.”

Response: Policy 2.2.1 a): The University of Guelph, with its substantial enrollment of approximately 31,627 full and part time students during the fall term (2023-2024), exemplifies the growing demand for on and off campus housing amid broader trends in higher education expansion across Ontario¹. The institution currently provides 16 residence communities accommodating approximately 5,000 students representing just 15.8% of its 2023-2024 fall term population². This supply falls short of addressing the needs of a diverse student body, leaving many to seek off-campus alternatives that strain local resources.

Policy 2.2.1 b): The Proposed 153-unit purpose student residence on a currently underutilized Site, represents a form of intensification that will result in additional housing designed specifically for students.

Policy 2.2.1 c): At 425 units per net hectare, the Proposed Development adds density to the Site while being respectful of surrounding uses and efficiently using the land, resources, infrastructure, and public service facilities that are available or anticipated.

Policy 2.2.1 d): The compact design, on-site bicycle parking, reduced parking rate, and proximity to public transit, on street bike lanes, university facilities, commercial amenities, parks and trails support active transportation and sustainable development.

Section 2.3.1 of the PPS outlines the general policies for settlement areas. Section 2.3.1.1 of the PPS states that settlement areas shall be the focus of growth and development. Section 2.3.1.2 of the PPS states that “*land use patterns within settlement areas should be based on densities and a mix of land uses which:*

a) efficiently use land and resources;

¹ Ontario Universities Fall Term Headcounts by Institution and Level of Study: [Table-3-Fall-Term-Headcounts-by-Institution-Level-of-Study.pdf](#)

² University of Guelph Student Housing January 2025: [Our Communities | University of Guelph](#)

- b) *optimize existing and planned infrastructure and public service facilities;*
- c) *support active transportation;*
- d) *are transit-supportive, as appropriate; and*
- e) *are freight-supportive.”*

Response: Policy 2.3.1.2 a): The Site is within the Settlement Area and Built-up Area in the City of Guelph, which is to be the focus of growth and development. The Proposed Development introduces 153 student resident units that efficiently utilizes the Site, as well as municipal infrastructure.

Policy 2.3.1.2 b): The Proposed Development will utilize existing municipal services and benefit from the nearby university amenities.

Policy 2.3.1.2 c): The Site fronts onto College Avenue East which provides sidewalks on both sides, on street bike lanes, access to local transit and proximity to commercial and recreational spaces. The inclusion of wide sidewalks, long-term and short-term bicycle parking promotes active transportation and healthy living.

Policy 2.3.1.2 d): The Proposed Development is served by a bus route connecting to the University’s transit hub, also located just a 10-minute walk from the Site and providing access to regional and local transportation modes. Additionally, the Site is well connected through the arterial road network and offers access to the Hanlon Expressway (Provincial Highway 6) via College Avenue West.

Section 2.3.1.3 states: *“Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.”*

Response: The intensification project will contribute to creating a complete community by developing the underutilized low-rise residential Site’s into a 153-purpose built student residence within an area well served by commercial and university facilities. The addition of much-needed student resident housing will enhance the City of Guelph’s housing options.

Policy 2.3.1.4 states: *“Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.”*

Response: In the context of Guelph's projected population growth to 208,000 by 2051, the proposed 10-storey, 153-unit purpose-built post-secondary student residence exemplifies the intensification and redevelopment objectives outlined in planning policies. As a built-up area adjacent to the University of Guelph, the Site aligns with Policy 6.2.5 and 6.2.6's directive for student housing, including off-campus options, while supporting the city's commitment to accommodate at least 15 years of residential growth primarily through intensification to ensure a diverse mix of housing densities including for institutional and educational uses.

Policy 2.3.1.5 outlines that large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.

Response: The City of Guelph is a large and fast-growing municipality (Appendix – Schedule 1) and is encouraged to have a target of 50 residents and jobs per gross hectare in designated growth areas. The Proposed Development positively contributes to the City meeting this growth target.

Policy 2.4.1.3 d) highlights that planning authorities should consider a student housing strategy when planning for strategic growth areas.

Response: Section 8 identifies strategic growth areas (SGAs) as including lands in proximity to publicly-assisted post-secondary institutions, as well as lands along arterial roads with frequent or higher-order transit service. While the City of Guelph does not formally designate the University of Guelph or the Site as an SGA, the Site is located immediately across College Avenue East from the University, along a key arterial road, and is well-served by local and regional transit.

University Centre Station functions as a major transit hub in the City, providing high levels of connectivity to surrounding neighbourhoods and municipalities. Of the City's 26 local transit routes, approximately 13 routes (50%) serve the University via University Centre Station. By comparison, Downtown Guelph's Major Transit Station accommodates approximately 42% of local routes. Although the Site is not formally within a Major Transit Station Area or an SGA, the scale, frequency, and convergence of transit services in the University area provide a level of accessibility and functionality comparable to an MTSA and SGA.

This high level of transit service supports higher-intensity, transit-oriented development and reinforces the appropriateness of intensification close to the University. While the City of Guelph does not have a formal student housing strategy, the Proposed Development

provides purpose-built student accommodations, helping to meet the housing needs of the University's student population in an appropriate location.

5.2.2 Infrastructure and Facilities

Chapter 3: Infrastructure and Facilities addresses planning for and providing sufficient infrastructure, public and open spaces to accommodate for growth and development. Relevant policies include:

Section 3.1.1 states: *"Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs. Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:*

- a) are financially viable over their life cycle which may be demonstrated through asset management planning;*
- b) leverage the capacity of development proponents, where appropriate; and,*
- c) are available to meet current and projected needs."*

Response: The Proposed Development will make efficient use of existing municipal servicing infrastructure, the road network, and public service facilities, including surrounding institutional uses, parkland, and commercial uses. The Functional Servicing Stormwater Report prepared by MTE determined that the existing municipal infrastructure for water, sanitary and storm is available and can support the Proposed Development.

Section 3.2.2 states: *"Efficient use should be made of existing and planned infrastructure, including through the use of transportation demand management strategies, where feasible."*

Response: The proposed vehicular and bicycle parking for the Development will efficiently utilize existing and planned infrastructure. Transportation Demand Management (TDM) strategies highlighted in the Transportation Impact Study by BA Consulting Group Ltd.

Section 3.6 of the PPS outlines the policies for sewage, water, and stormwater. Section 3.6.1 states: *"Planning for sewage and water services shall:*

- a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing municipal sewage services and municipal water services and existing private communal sewage services and private communal water services;*
- b) ensure that these services are provided in a manner that:*

1. *can be sustained by the water resources upon which such services rely;*
 2. *is feasible and financially viable over their life cycle;*
 3. *protects human health and safety, and the natural environment, including*
 4. *the quality and quantity of water; and aligns with comprehensive municipal planning for these services, where applicable.*
- c) *promote water and energy conservation and efficiency;*
 - d) *integrate servicing and land use considerations at all stages of the planning process;”*

Section 3.6.2 of the PPS states that municipal sewage services and municipal water services are the preferred form of servicing for settlement areas to support the protection of the environment and minimize potential risks to human health and safety.

Response: The Proposed Development at the Site aligns with Section 3.6.2 of the PPS by utilizing municipal sewage and water services as the preferred servicing option to protect the environment and safeguard public health. A new 200 mm diameter sanitary sewer line will connect to the existing municipal 200 mm sewer on College Avenue East, ensuring adequate capacity and slope for the building while details are finalized in design. Similarly, a new connection to the existing 300mm municipal watermain on College Avenue East will provide a 200 mm diameter service to the Site, with a fire flow assessment confirming sufficient supply (up to 16,500 L/min at 140 kPa minimum pressure) to meet building code requirements.

Section 3.6.8 states: *“Planning for stormwater management shall:*

- a) *be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*

Response: Stormwater management servicing for the Proposed Development will be coordinated with overall Site servicing for sewage and water. It is feasible to service the Site and will be done at the Developer’s expense.

- b) *minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*

Response: The Proposed Development achieves a positive post-development water balance. The project increases the Site’s imperviousness from 29.2% to 79.0%, potentially reducing annual groundwater infiltration from 392 cubic meters and elevating runoff volumes.

	<p>However, to comply with policies and safeguard the Wellhead Protection Area (WHPA-B), it incorporates an on-site infiltration gallery capturing clean runoff from rooftops and select landscaped areas (0.126 hectares at 15 mm depth). This achieves 462 cubic meters of annual infiltration, a net gain of 103 cubic meters over pre-development levels, while excluding parking lot runoff to reduce contaminants.</p>
<p>c) <i>minimize erosion and changes in water balance including through the use of green infrastructure;</i></p>	<p><u>Response:</u> To minimize erosion and water balance changes per stormwater management policies, the Proposed Development prioritizes green infrastructure, including permeable surfaces and vegetated buffers, while implementing construction precautions such as installing erosion controls before grading and carefully managing materials and equipment to prevent site contamination.</p>
<p>d) <i>mitigate risks to human health, safety, property and the environment;</i></p>	<p><u>Response:</u> The Proposed Development will be designed to accommodate a 100-year storm and improve drainage patterns.</p>
<p>e) <i>maximize the extent and function of vegetative and pervious surfaces;</i></p>	<p><u>Response:</u> The Proposed Development has been designed to maximize the extent and function of vegetative and pervious surfaces.</p>
<p>f) <i>promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and</i></p>	<p><u>Response:</u> Stormwater management best practices have been considered in the servicing design and will continue to be evaluated and integrated during detailed design.</p>
<p>g) <i>align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater</i></p>	<p><u>Response:</u> The Functional Servicing Stormwater Management Report has considered the City of Guelph's stormwater management policies and practices and</p>

from development on a watershed scale.”

factored in the stormwater criteria provided by Engineering staff.

5.3 City of Guelph Official Plan

The OP was adopted by City Council on November 1, 1994, and approved by the Ministry of Municipal Affairs and Housing (“MMAH”) on December 20, 1995. The latest update, Official Plan Amendment No. 80 (“OPA 80”), was adopted by City Council on July 11, 2022, and approved by MMAH on April 11, 2023. OPA 80 was adopted prior to the approval of the current PPS.

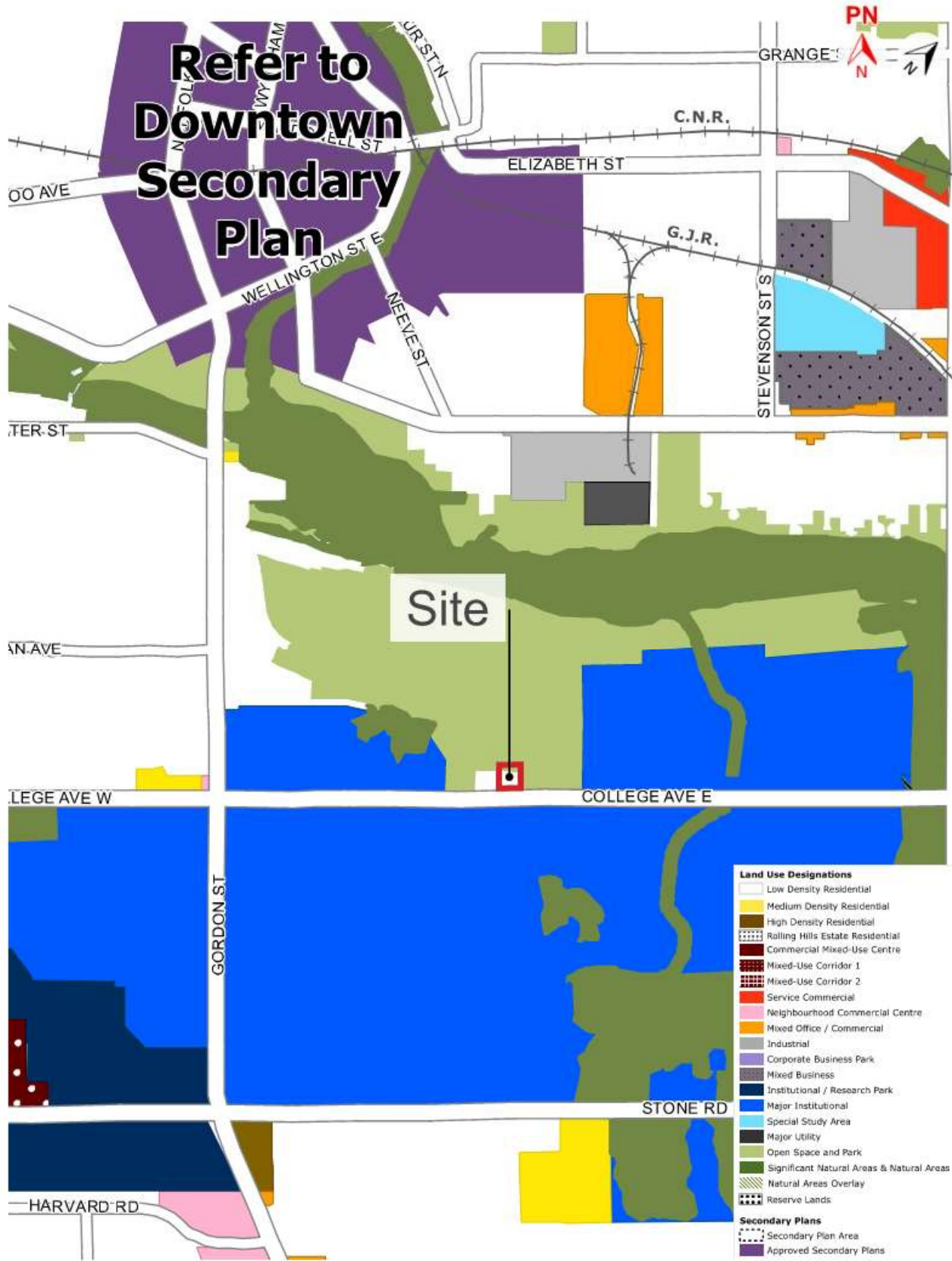
In October 2024, the Province issued the PPS, 2024, a comprehensive province-wide land use planning policy that supersedes the PPS 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe. All planning decisions shall be consistent with the PPS 2024. Accordingly, the City of Guelph is in the process of amending its OP for consistency, incorporating updates to definitions, policies, and mapping. The Phase 1 OP Amendment number 110 was presented at Council on October 15, 2025, for receipt only. This amendment proposes multiple phases of implementation: Phase 1, which provides amendments to reflect changes to the Planning Act, Ontario Heritage Act, the PPS 2024 and amendments to align with the Transportation and Parks Master Plans, Phase 2, which will address Employment and Transportation and subsequent future phases, which will focus on Institutional/places of worship, commercial and special policy areas. A review and summary of comments were intended to be circulated to council in December 2025 and a City Council decision meeting for the Phase I amendment is scheduled to take place in January 2026.

The Site is currently designated in the City of Guelph Official Plan, February 2024 consolidation as:

- Within the “Settlement Area” and “Built-up Area” on Schedule 1a – “Urban Structure” (**Figure 10**);
- “Low Density Residential” on Schedule 2 – “Land Use Plan” (**Figure 11**);
- Within the “Wellhead Protection Area B” (WHPA-B) on Schedule 7a – “Source Water Protection Wellhead: Protection Areas” (**Figure 12**); and,
- Within the “Issue Contributing Areas for Nitrate and TCE” on Schedule 7b – “Source Water Protection: Issue Contributing Areas” (**Figure 13**).

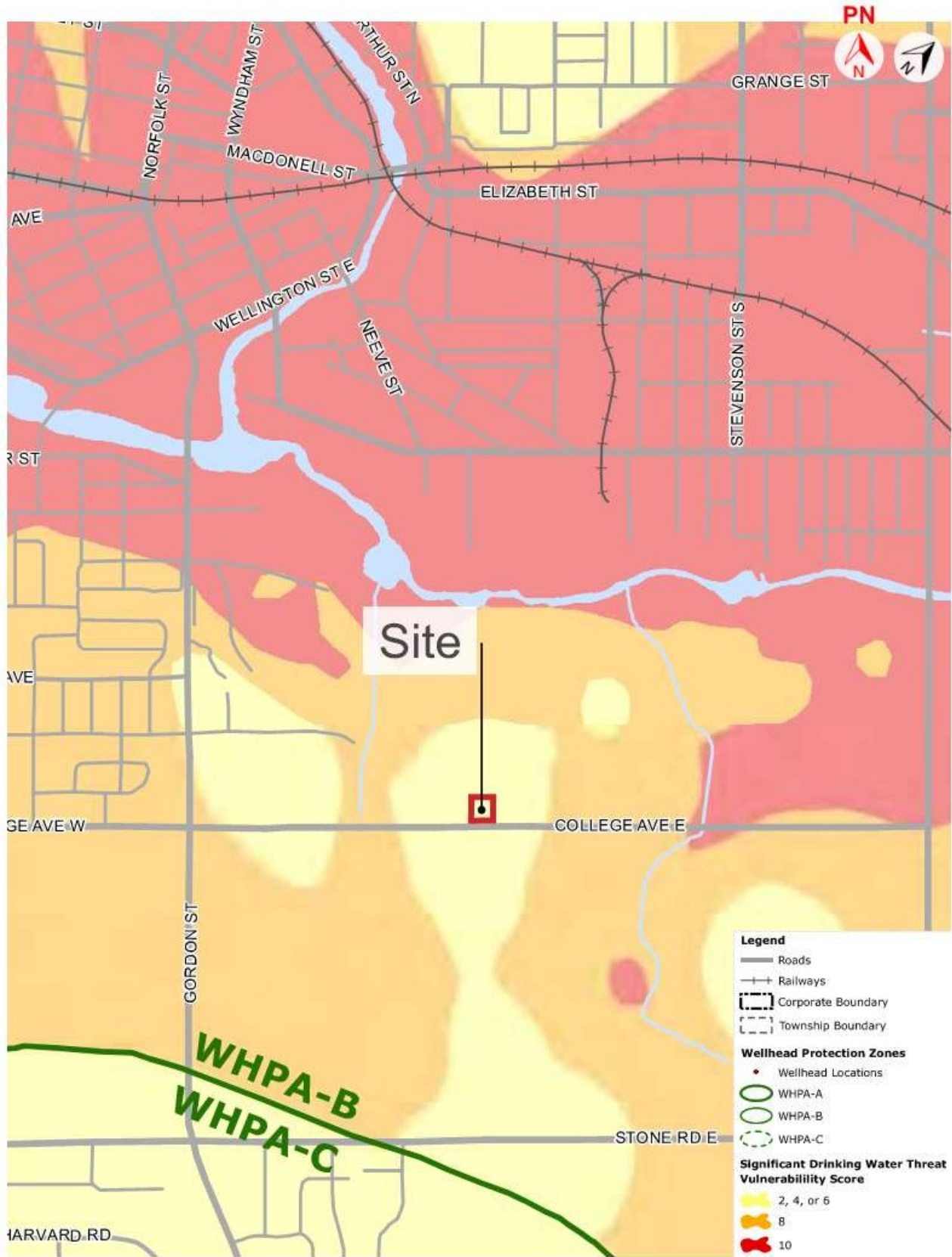
The Proposed Development seeks an OPA to redesignate the Site to “High Density Residential” to allow a 10-storey, 153 unit purpose built post-secondary residence, with a site-specific policy to increase the maximum density from 150 units per net hectare to a maximum of 425 units per net hectare. The following provides a summary of the applicable OP policies that apply to the Site and the Proposed Development and justification in response to said policies.





Source: City of Guelph Official Plan Schedule 2, Land Use Plan (2024)

Figure 11



Source Water Protection
(Wellhead Protection Areas)

Source: City of Guelph Official Plan Schedule 7a, Source Water Protection (Wellhead Protection Areas) (2024)

Figure
12



Source Water Protection
(Issue Contributing Areas)

Figure

13

Source: City of Guelph Official Plan Schedule 7b, Source Water Protection (Issue Contributing Areas) (2024)

5.3.1 Strategic Directions

The OP's Strategic Goals, outlined in Section 2.3, focus on creating a complete community, directing development to areas with existing municipal services, offering a range of housing types, including affordable options, and promoting compatible intensification while preserving the city's character.

Response: The proposed student residence directly north of the University of Guelph's central campus aligns with the OP's Strategic Goals by enhancing the mix of housing options to meet projected community needs through 2051, thereby promoting efficient urban growth patterns in a rapidly growing academic hub (multi-cultural student population, educational and knowledge-based sectors). The Proposed Development will promote intensification and redevelopment in an existing urban area, enhancing proximity to campus facilities to encourage cycling and walkability, reducing transportation demands and creating a safe, livable and healthy community. Furthermore, by optimizing existing municipal services (water, storm, sanitary and transit infrastructure) the Proposed Development will minimize municipal costs and enhance sustainable urban density.

5.3.2 Planning a Complete and Healthy Community

A key theme of the OP is planning for complete communities that provide access to various housing options and densities, local services, recreational facilities, healthy food options, and public transit. The City of Guelph is projected to grow to approximately 208,000 residents by 2051 (Section 3.2.1). Section 3.4 of the OP sets out strategies to accommodate growth.

Section 3.3 relates to Housing Supply and states: *“To provide for an appropriate range and mix of housing options 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 15 years through residential intensification and redevelopment and, if necessary, 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.”*

Section 3.4 relates to the delineated built-up area and general intensification which shall accommodate population and employment growth through infill and intensification.

1. *The delineated built-up area is identified on Schedule 1a of this Plan. The built-up area has been delineated in accordance with A Place to Grow and is based on the limits of the developed urban area as it existed on June 16, 2006. The delineated built-up area remains fixed for the purpose of measuring the density and intensification targets of the Official Plan.*
2. *The minimum intensification target for the delineated built-up area is as follows: a minimum of 46% of all residential development occurring annually will be within the delineated built-up area.*
3. *The City will promote and facilitate intensification throughout the delineated built-up area, and in particular within Downtown and Strategic Growth Areas as identified on Schedule 1a.*
4. *To support the achievement of the minimum intensification target, vacant or underutilized lots, greyfield, and brownfield sites will be revitalized through the promotion of infill development, redevelopment and expansions or conversion of existing buildings.*
5. *A diverse range and mix of housing options and densities will be planned, including affordable housing and additional residential dwelling units to meet projected needs of current and future residents at all stages of life and to accommodate the needs of all household sizes and incomes.*
6. *Development within the delineated built-up area will be encouraged to generally achieve higher densities than the surrounding areas while achieving an appropriate transition of built form to adjacent properties.*
7. *Development within the delineated built-up area will create attractive and vibrant spaces in accordance with the urban design policies of this Plan.”*

Response: The Site is located within the built-up area as shown on **Figure 10** above. The Proposed Development represents the intensification of a vacant and underutilized residential Site, introducing 153 student resident units which is appropriate given the Site’s location within the built-up area and its alignment with the City’s intensification and growth policies. The Proposed Development contributes to meeting the housing needs of future residents at all stages of life. The increase in density in the form of compact development will contribute to the diverse range and mix of housing options and densities in the surrounding area.

The Ownership team is considering financing through the CMHC Student Housing program and if achievable and accepted, aims to exceed the minimum number of units required to meet the program’s affordability criteria.

The Proposed Development will consist of two-, three-, and four-bedroom units tailored to accommodate various students. Through high-quality urban design, the project will create an attractive and vibrant space that enhances the public realm and provides a sensitive transition to the adjacent low-density residential use to the west.

Section 3.6 relates to Strategic Growth Areas and states:

2. *Strategic growth areas provide a focus for investment in transit, other infrastructure and public service facilities to support forecasted growth while supporting a more diverse range and mix of housing options.*
3. *Strategic growth areas will be planned and designed to:*
 - i. *achieve increased residential and employment densities that support and ensure the viability of existing and planned transit service levels;*
 - ii. *be well served by transit and facilitate pedestrian and cycling traffic;*
 - iii. *provide mixed-use development in a higher density, compact form that supports walkable communities and live/work opportunities; and*
 - iv. *provide a mix of residential, office, institutional, and commercial uses that allows for a range of housing options and services.*

Response: Comparable municipalities hosting major universities such as Kingston and Waterloo have increasingly designated these institutions as integral components of Major Transit Station Areas (MTSA) to foster integrated growth, sustainable transportation, and economic vitality, recognizing the universities role as hubs that draw dense populations (see Appendix A). This alignment reflects a broader provincial emphasis on prioritizing development around high-capacity transit nodes to mitigate sprawl and enhance accessibility. The City of Guelph identifies Strategic Growth Areas (SGA's) in proximity to the University of Guelph but stops short of classifying the university itself as a MTSA or SGA.

While the City's downtown is designated as an MTSA to prioritize high-intensity growth around its core transit node, adjacent locales like the Site directly north to the university's main campus and transit hub along College Avenue East are not within an MTSA or SGA despite that they offer potential for complementary expansion. The Site proposed for redevelopment and intensification will facilitate access to both local (Guelph Transit) and Regional (Go Transit) networks presenting an exemplary case for increased density and intensification while creating an attractive and vibrant space for students.

5.3.3 Protecting What is Valuable

Section 4.2.4 relates to Source Protection which is a crucial measure designed to safeguard municipal drinking water sources, protecting both human health and the environment. By restricting land uses and activities within designated areas, including Wellhead Protection Areas and Intake Protection Zones, the OP aims to mitigate potential threats to water quality and supply. The Clean Water Act, 2006, identifies vulnerable areas susceptible to significant drinking water threats through Schedule 7 (a and b).

Response: The Site is located within a Source Water Protection Policy Area specifically Wellhead Protection Area B (WHPA-B) with a vulnerability score of 6 (see **Figure 12** above) and an Issue Contributing Area for Nitrate and TCE (see **Figure 13** above). The Site requires post-development infiltration to match pre-development volumes. Only clean and landscaped runoff may infiltrate; parking lot runoff is prohibited. Mitigation uses an on-site infiltration gallery for 15 mm runoff from 0.126 ha of rooftop and landscaped areas, achieving 462 m³/year infiltration and a net gain of 103 m³/year.

5.3.4 Urban Design

When considering all land uses, the urban design policies in Section 8 are to be assessed. A full analysis of the urban design policies in the OP is included in the Urban Design Brief, prepared by GSP Group.

5.3.5 Land Use

Chapter 9 outlines the objectives, policies, and permitted uses for the land use designations listed in Schedule 2, providing a framework for development and decision-making under the Planning Act.

The objectives outlined in Section 9.3 aim to guide residential development by ensuring an adequate supply of land to accommodate population growth, promoting diverse housing types and densities, and supporting the needs of current and future residents. These objectives seek to achieve a balance between intensification and compatibility with existing neighborhoods, while also encouraging transit-supportive densities, walkable communities, and energy efficiency. Furthermore, they aim to promote innovative housing forms, support home occupations, and conserve older housing stock, ultimately striving to create vibrant, accessible, and sustainable residential areas that cater to the needs of all socio-economic groups.

When assessing development proposals for multi-unit residential development within residential designations, the following criteria in Section 9.3.1.1 are to be used to assess development proposals in conjunction with the applicable Urban Design policies:

<p>1. <i>Building form, scale, height, setbacks, massing, appearance and siting are compatible in design, character and orientation with buildings in the immediate vicinity.</i></p>	<p><u>Response:</u> The surrounding area includes open space to the north and east, an arterial right-of-way to the south and a low-rise single-detached dwelling to the west. The proposed 10-storey rectangular building proposes reduced stepbacks above the seventh storey on the south and westerly elevations (from 3 meters to 2 meters) and a minimized front, interior and rear yard setbacks utilizes innovative architectural strategies to make it compatible and contextually responsive to the above noted surrounding uses.</p> <p>The proposed built form incorporates an angled form starting at the 7th storey facing the street and western lot line, coupled with a diverse material palette of glass, wood, and metal panels, artfully diminishes perceived massing, fosters visual intrigue, and preserves a pedestrian-friendly scale at grade. This angled facade exceeds the stepback requirements in key areas to curb shadowing and bulk. Abutting a non-residential golf course to the rear, the adjusted setback accommodates landscaping and an infiltration gallery, ensuring clear separation and vibrancy without adverse impacts.</p>
<p>2. <i>Proposals for residential lot infill will be compatible with the general frontage of lots in the immediate vicinity.</i></p>	<p><u>Response:</u> The proposed 10-storey post secondary student residence, situated on three consolidated low-rise residential lots, is compatible infill development within a transitional urban fabric, where the neighbourhood incrementally</p>

	<p>accommodates growth amid its proximity to the University of Guelph. The proposed high-rise structure harmonizes with surrounding contexts by aligning with prevailing street frontages and setbacks, as seen to the west where buildings address the street at varying depths, fostering a cohesive built edge despite topographic and lot-size variations.</p>
<p><i>3. The residential development can be adequately served by local convenience and neighbourhood shopping facilities, schools, trails, parks, recreation facilities and public transit.</i></p>	<p><u>Response:</u> The proposed Post Secondary Student Residence benefits from its proximate access to essential amenities that ensure student convenience and quality of life. Situated less than a seven (7) minute drive or a 27 minute bus ride via the GT 15 line from a commercial plaza featuring multiple stores serving day-to-day needs, including a grocery store. Additionally, the Sites immediate proximity to the University of Guelph’s main campus provides access to a comprehensive array of educational, health, social, cultural and recreational facilities tailored for students and broader community use, including trails (i.e. Guelph Arboretum), parks and public transit integration.</p>
<p><i>4. Vehicular traffic generated from the proposed development will not have an unacceptable impact on the planned function of the adjacent roads and intersections</i></p>	<p><u>Response:</u> The Proposed Development will not impose unacceptable impacts on adjacent roads and intersections as supported by the comprehensive traffic analysis. All study intersections are projected to operate within capacity, maintaining acceptable levels of service (LOS) with negligible site-generated effects, avoiding the need for signal</p>

	timing adjustments or infrastructure enhancements.
5. <i>Vehicular access, parking and circulation can be adequately provided and impacts mitigated.</i>	<u>Response:</u> Per the Transportation Impact Study, vehicular access, parking and circulation can be adequately provided. Vehicle access to and from the Site will occur via a stop-controlled driveway on College Avenue East, positioned with the existing driveway serving 222 College Avenue, facilitating integration with current infrastructure. The proposed driveway will provide direct entry to the Site's underground parking and dedicated loading area optimizing vehicular flow while minimizing disruption to surrounding traffic patterns.
6. <i>That adequate municipal infrastructure, services and amenity areas for residents can be provided.</i>	<u>Response:</u> The proposed post-secondary student residence utilizes existing municipal infrastructure and provides 1,627.29 sq.m. of interior common amenity space and 849.76 sq.m. of outdoor common amenity space. The interior common amenity provides a range of amenity spaces (fitness, wellness, study, event space, lounge and meeting rooms) while the outdoor amenity is configured as a ground-floor courtyard, side-yard amenity, and 10th-floor roof terrace, for a total common amenity area of 2,477.05 sq.m.
7. <i>Surface parking and driveways shall be minimized.</i>	<u>Response:</u> The proposed parking structure accommodates all required parking spaces, while the Site's driveway facilitates access to underground parking and dedicated loading areas by leveraging the existing grade change.

<p>8. <i>Development shall extend, establish or reinforce a publicly accessible street grid network to ensure appropriate connectivity for pedestrians, cyclist and vehicular traffic, where applicable.</i></p>	<p><u>Response:</u> The Proposed Development reinforces the publicly accessible street grid by ensuring seamless connectivity for pedestrians, cyclists and vehicular traffic through strategically designed access points and facilities. Pedestrian entry is facilitated via a primary entrance along the south frontage adjacent to College Avenue East and two supplemental accesses on the west frontage, linked by dedicated walkways to the surrounding pedestrian network. Vehicular access occurs through a dedicated site driveway serving underground parking, loading areas, and pick-up/drop-off zones. Bicycle accommodations include long-term spaces on the P2 level of the parking garage, accessible via the east-side service elevator, and short-term spaces along the south frontage near the primary pedestrian entrance, thereby promoting multimodal integration while maintaining urban permeability.</p>
<p>9. <i>Impacts on adjacent properties are minimized in relation to grading, drainage, location of service areas and microclimatic conditions, such as wind and shadowing.</i></p>	<p><u>Response:</u> The Proposed Development incorporates a grading and drainage strategy designed to safeguard adjacent properties. By respecting existing grades along surrounding property lines and the right-of-way, the plan includes swales directing landscaped runoff to an infiltration gallery and a catchbasin for driveway flows, while retaining walls address elevation changes along the northeast and north boundaries, ensuring stormwater is routed away from the building and toward the north golf course via a major overland flow path. Service areas, including the driveway and</p>

	<p>underground parking, are strategically located to avoid encroachment on neighboring lots. Although the building's height exceeds surrounding structures, potentially redirecting winds at ground level, existing conditions already suit pedestrian use year-round, and projections confirm no adverse effects on adjacent properties, with safety criteria met throughout and wind control measures planned for the Level 10 amenity. Shadowing impacts are minimal, minimized by the Site's orientation.</p>
<p><i>10. The development addresses public safety, identified public views and accessibility to open space, parks, trails and the Natural Heritage System, where applicable.</i></p>	<p><u>Response:</u> The Proposed Development will increase public activity and surveillance of the Site through the addition of new residents and the proposed site design. The Site includes at grade amenities, multiple sightlines, and connections to the public realm.</p>
<p><i>11. The conservation and integration of cultural heritage resources, including identified key public views can be achieved subject to the provisions of the Cultural Heritage Resources Section of this Plan.</i></p>	<p><u>Response:</u> This Proposed Development and adjacent properties do not include any known cultural heritage resources.</p>

The High-Density Residential Designation under Section 9.3.4 is characterized by the prevalence of high-density multiple unit residential buildings, thereby optimizing land utilization and promoting dense, walkable communities. This designation permits multiple unit residential buildings generally in the form of apartments (Section 9.3.4.1. i)). The minimum height permitted is three (3) storeys with a maximum height of ten (10) storeys (Section 9.3.4.2.) and a minimum net density of 100 units per hectare and a maximum of 150 units per hectare (Section 9.3.4.3.).

Response: The Proposed Development will provide 153 purpose-built post-secondary student resident units. The Site benefits from existing services and is located along an arterial road in a walkable area well served by cycling routes, public transit and student community services. The proposal will achieve compatible intensification with appropriate transitions to the existing low-density residential use to the west of the Site. This much needed student residence aligns with the objectives of residential areas by promoting a range of housing types, affordability, densities, and tenure, supporting the social and well-being needs of current and future student residents at all stages of life.

The interpretation policies in Section 1.3.14 highlights that, “*when considering an application to amend the Official Plan, Council shall consider the following matters:*”

- i. The conformity of the proposal to the strategic directions of this Plan and whether the proposal is deemed to be in the overall interest of the city;*
- ii. Consistency with applicable provincial legislation, plans and policy statements;*
- iii. Suitability of the site or area of the proposed use, particularly in relation to other sites or areas in the city;*
- iv. Compatibility of the proposed use with adjacent land use designations;*
- v. The need for the proposed use, in light of projected population and employment targets;*
- vi. The market feasibility of the proposed use, where appropriate;*
- vii. The extent to which the existing areas of the city designated for the proposed use are developed or are available for development;*
- 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;*
- ix. The financial implications of the proposed development; and*
- x. Other matters as deemed relevant in accordance with the policies of this Plan.”*

Response: The Proposed Development is proposing to deliver 153 purpose-built student resident housing units. This deeply aligns with the Strategic directions of the OP as noted above in section 5.3.1 of this report. The Proposed Development is compatible with the adjacent uses and will assist in increasing supply of much needed purpose-built student resident units within the community. The Site has access to existing municipal services and can be accommodated by the existing road network. The Site is in an area with direct connection (5 minute walk) to major community uses for students at the University of Guelph such as the Gryphon Field House which provides multi-purpose spaces, ice rink, pools, gymnasiums, studio rooms, meeting rooms and student health services additionally outdoor

sports fields and softball diamonds are located closer to the Proposed Development. The Proposed Development will have a positive impact on the housing market and future student residents.

5.4 City of Guelph Zoning By-law (2023)-20790

As of February 6, 2024, the Comprehensive Zoning By-law (2023)-20790, approved by City Council on April 18, 2023, is in effect, except for the lands and sections under appeal at the Ontario Land Tribunal (Case No. OLT-23-000462). For areas still under appeal, Zoning By-law (1995)-14864 should still be referenced.

The City advised that any ZBA should only amend Zoning By-law (2023)-20790, even though parts of Zoning By-law (1995)-14864 remain in effect. Notably, Zoning By-law (2023)-20790 was adopted before the approval of the current PPS.

The Site is currently zoned Low Density Residential 1 “**RL.1**”, and Low Density Residential 1- Holding Symbol 1 “**RL.1(H1)**” in Schedule A, Map 39 of the Zoning By-law (see **Figure 14**). The RL.1 zone generally limits residential uses to single detached dwellings, semi-detached dwellings and duplex dwellings and small multi-unit residential buildings including on-street townhouses.

A holding provision (H1) was applied to the Site through the Zoning By-law (2023)-20790. Section 17.1.1 outlines that the purpose of the holding provision is to ensure that the use of lands is not intensified until the owner has completed the following conditions to the satisfaction of the City:

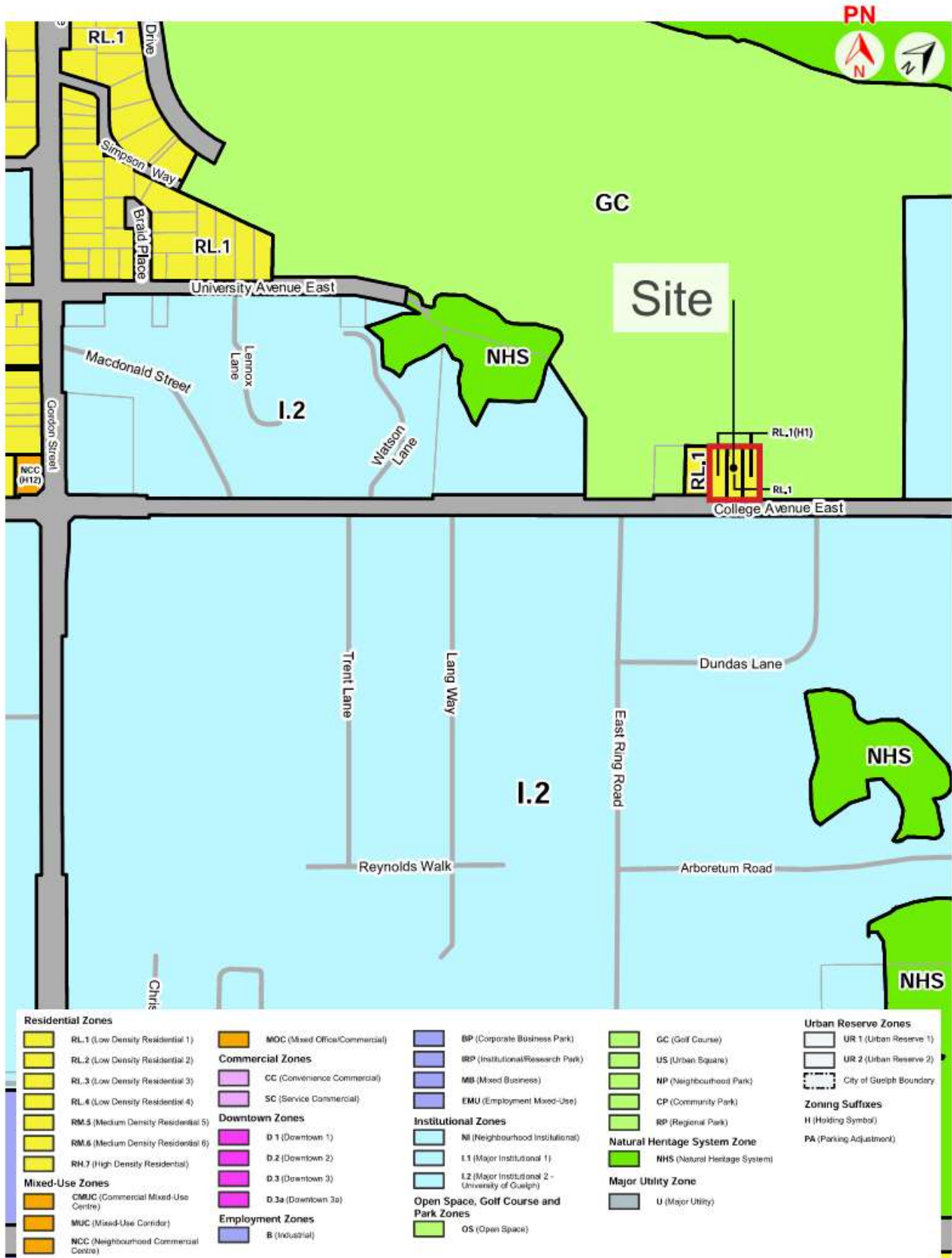
- (i) That the owners enter into an Engineering Services Agreement with the City satisfactory to the City Engineer.*
- (ii) That the owners agree to pay their share of the actual cost of constructing and installing the following works:
 - (A) sanitary sewer complete with all appurtenances including restoration on College Avenue from Power House Lane to the middle of the lands associated with 222 College Avenue East;*
 - (B) sanitary sewer laterals including restoration to each of the properties.**
- (iii) That the owners pay to the City, the City’s estimate of the cost of constructing the above noted works.*
- (iv) That the owners have connected their dwellings to the municipal watermain to the satisfaction of the City Engineer and the City’s Plumbing Inspector. Furthermore, the*

owners have paid to the City all unpaid frontage and lateral charges in accordance with the policies of the City.

- (v) That the owners have connected their dwellings to the municipal sanitary sewer to the satisfaction of the City Engineer and the City's Plumbing Inspector.*
- (vi) That any domestic wells on the properties have been properly abandoned in accordance with current Ministry of the Environment Regulations and Guidelines to the satisfaction of the City Engineer.*
- (vii) That the owners have entered into an Agreement with the City, registered on title, satisfactory to the City Solicitor covering the above noted conditions.*

To proposed ZBA would rezone the Site to a High-Density Residential **RH.7** (RH.7-XX) zone. The requested site-specific provisions relate to the use, density, setbacks, angular plane, landscape buffer, floorplates, tower separation, active entrances, common amenity area, off-street parking space sizes and parking rates.

The amendment will facilitate the redevelopment of the Site for purpose-built student housing adjacent to the University of Guelph. The zoning chart below highlights the applicable zoning regulations and outlines what is proposed for the Development.



City of Guelph Zoning Bylaw (2023) - 20790
 Source: City of Guelph Zoning Bylaw (2023) - 20790 Schedule A, Map 39 (2023)

Figure
14

5.4.1 Zoning By-law Compliance Chart

A Zoning By-law compliance chart for the Proposed Development to the current Zoning By-law is provided in Table 3.0 identifying the relief required for the above noted site specifics.

Table 3.0 Zoning By-law Compliance Chart

Provision is under appeal in Zoning By-law (2023)-20790 (OLT-23-000462)

Zoning Regulations	Zoning by-law No. Proposed 'RH.7' Zone	Provided	Compliance
Table 6.32: RH.7 Apartment building lot regulations			
Permitted Uses	Apartment Building	Post Secondary Student Residence	No
Lot Frontage (minimum)	30 m	61.60 m	Yes
Residential density units per hectare (uph)	Minimum 100 uph Maximum 150 uph	425 units/ha (net density)	No
Table 6.33: RH.7 Apartment building setback regulations			
Front yard or exterior side yard	Minimum 6 m Maximum 11 m	4.3 m	No
Interior side yard (minimum)	3 m (1) (1) Where windows of a habitable room face an interior side yard, the minimum interior side yard setback shall be 7.5 m	East: 5.5 m and 0.2 m retaining wall	East: No
		West: 9.5 m	West: Yes
Rear yard (minimum)	7.5 m	5.5 m and 0.2 m for the retaining wall	No
Buffer strip (minimum)	A 3 m buffer strip is required adjacent to interior side and rear lot lines. 3 m buffer strip is required around the perimeter of surface parking lots	North: 5.5 m with retaining wall and transformer within	North: No
		East: 0.2 m to Parking Ramp	East: No
		West: 9.5 m	West: Yes
Landscaped open space (min)	40 % of lot area (5)(6)(7) (5) 50% of landscaped open space shall be covered by soft landscaping in the form of natural vegetation, such as grass, flowers, trees and shrubbery. (6) 30% of the required landscaped open space can be in the form of a green roof or blue roof. (7) Landscaped open space shall occupy the front yard of any lot, except the driveway, within the Older Built-up Area Overlay, Schedule B-1. No parking shall be permitted within this landscaped open space.	40% Softscape Hardscape Green/Blue Roof	Yes
Table 6.34: RH.7 Apartment building - building regulations			
Building height (min)	3 storeys	10 Storeys	Yes
Building height (max)	10 Storeys in accordance with Section 4.14		
Floorplate size (max)	7th and 8th storeys - 1,200 sq. m Each storey above 9th storey - 1,000 sq.m	7 th : 1,564 sq.m.	No
		8 th : 1278 sq.m	No
		9 th : 1095 sq m	No
		10 th : 870 sq.m	Yes

Zoning Regulations	Zoning by-law No. Proposed 'RH.7' Zone	Provided	Compliance
Building setbacks (min)	3 m for all portions of the building above the 6th storey facing a street for buildings located within 15 m of a street	0 m above the 6 th storey (requesting 2.0 m above the 7 th storey)	No
Building length (max)	75 m for buildings located within 15 m of a street for the portion of the building adjacent to the street	44.9 m	Yes
Active entrance	When a building(s) or portion thereof is within 15 m of a street line, a minimum number of 1 active entrance for every 30 m of street line shall be required for the portion of the building facing the street (2 required for 44.9 m building)	1 Active Entrance	No
Tower separation	The tower portion of a building shall be setback a minimum of 12.5 m from an interior side lot line and a rear lot line measured perpendicularly from the exterior wall of the 6th storey	Rear: 5.5 m	Rear: No
		East Interior: 5.5 m	East: No
		West Interior: 9.5 m	West: No
Common amenity area (min) Common amenity area means an amenity area which is located inside or outside a building or structure	20 m ² per dwelling unit (2)(3)(4) (2) Common amenity area: a. Common amenity areas shall be aggregated into areas not less than 50 sq.m and shall be designed and located so that the length does not exceed 4 times the width. b. Common amenity areas shall be located in any yard other than the required front yard or required exterior side yard. c. Landscaped open space areas, building rooftops, patios, and above ground decks may be included as part of the common amenity area if recreational facilities are provided and maintained, such as swimming pools, tennis courts, lounges, and landscaped areas. d. Rooftop common amenity area shall be located a minimum of 2 m from the roof edges facing an interior side yard (3) n/a (4) n/a 153 units x 20 sq.m = 3,060 sq.m.	Interior Common Amenity: 1,627.29 sq.m. Outdoor/Terrace Common Amenity: 849.76 sq. m Total Common Amenity Area provided: 2,477.05 sq.m (16.18 sq.m per dwelling unit) Total Common Amenity Area proposed: proposed 2,448 sq.m. (16 sq.m. / unit)	No
Table 6.35: RH.7 Apartment building angular plane regulations			
Angular plane	Building heights shall not exceed an angular plane of 30 degrees measured from the property line for the interior side yard and/ or rear yard lot lines when adjacent to RL.1 and/or RL.2 zone	West: 61 degrees	No
Angular plane	In accordance with Section 4.14.4 (i) Building heights shall not exceed an angular plane of 45 degrees from the centre line of the street	South: 45 degrees	Yes
Part C, Section 5. Parking			
Section 5.3.3 Compact parking space dimensions	(a) A maximum of 15% of the minimum required parking spaces may be designed, provided and maintained for compact vehicles. (b) Despite any other provision, parking spaces for compact vehicles shall have a minimum size of 2.4 m in width and 5.5 m in length, except this shall not	6 Spaces at 2.4 m x 5.5m (9%)	Yes

Zoning Regulations	Zoning by-law No. Proposed 'RH.7' Zone	Provided	Compliance
	apply to parallel parking spaces or accessible parking spaces.		
Table 5.2– Minimum parking space dimensions	Apartment building (over 3 units) 2.75 m width x 5.5 m length (excluding any obstructions)	2.75 m x 5.5 m	Yes
Section 5.2.2	(a) Every parking space for the uses specified in 5.2.2 shall be located in the interior side yard or rear yard, and any parking area or parking space shall be setback 3 m from any lot line. (b) Any surface driveway or surface parking area shall be setback 3 metres from a building wall, entrance or any window of a habitable room.	1 pick up/ drop off space proposed in the front yard 1.65 m from the front lot line 0 m to a ramp	No No
Table 5.3 Required parking rates in all zones except downtown zones	Apartment building Minimum Required: For the first 20 dwelling units: 1.5 spaces per dwelling unit, and for each dwelling unit in excess of 20: 1.25 spaces per dwelling unit. A minimum of 20% of the required parking spaces shall be for the use of visitor parking 197 spaces required (40 Visitor)	65 spaces (13 Visitor-20%)	No Yes, compliant/proportionate with requested parking ratio
Table 5.5 Accessible Parking	Table 5.5 Accessible Parking Rates 3. 101 to 200 req spaces: 1 + 3% = 7 (3 Type A and 4 Type B)	4 Spaces (2 Type A, 2 Type B) Will comply based on approved amended parking ratio	Yes, compliant with requested parking ratio above
Table 5.7 - Required bicycle parking rates in all zones except downtown zones	Minimum bicycle parking (short term) 16 (0.1 spaces per unit) Minimum bicycle parking spaces (long term): 153 (1 space per unit)	16 short term 194 long term	Yes Yes
Section 5.8.1 Bicycle parking space design and location	(a) (ii) A minimum of 25% of the required bicycle parking spaces, long term (39 spaces) shall be stored in a horizontal ground-mounted position. The remainder of the spaces may be provided as stacked or vertical spaces. (a)(iii) For apartment buildings, mixed-use buildings and townhouses where individual garages are not provided (back-to-back, cluster, stacked and stacked back-to-back townhouses), a minimum of 5% (8 spaces) of the required bicycle parking spaces, long term shall be provided in individually secured enclosures that are a minimum of 1 m wide by 2.6 m in horizontal length and a minimum 1.9 m vertical clearance, and shall have access to an electrical outlet.	100 % 0 %	Yes To conform at site plan
Section 5.8.2 Bicycle parking space and aisle dimensions	(a) Horizontal bicycle parking spaces shall: (i) Be a minimum dimension of 0.6 m wide by 1.8 m horizontal length, with a minimum vertical clearance of 1.9 m. (ii) Be accessed by an aisle with a minimum width of 1.5 m.	Horizontal Stalls at 1.8 m x 0.6 m with min aisle width of 1.5 m	Yes

Zoning Regulations	Zoning by-law No. Proposed 'RH.7' Zone	Provided	Compliance
Section 5.9 Electrical Vehicle Parking	(a) A minimum of 20% of the total required parking spaces for multi-unit buildings with 3 or more dwelling units and mixed-use buildings on lots identified with a (PA) suffix shall be provided as electric vehicle parking spaces.	N/A property does not have a PA suffix	N/A
	(b) A minimum of 80% of total required parking spaces for multi-unit buildings with 3 or more dwelling units, townhouse – cluster, stacked, stacked back-to-back, and mixed-use buildings shall be provided as designed electric vehicle parking spaces.	65 spaces x 0.8 = 52 Spaces	Yes
Table 4.1 Permitted Encroachments			
Exterior Stairs	Maximum front yard encroachment 1.5 m	4.10 m front yard encroachment (into new proposed front yard setback)	No
	Minimum front yard setback 0.8 m	0.2 m front yard setback	No
	Maximum interior side yard encroachment 1.5 m	1.5m encroachment and 1.3m encroachment into required interior side yard	Yes
	Minimum interior side yard setback 0.6 m	6 m and 6.2 m	Yes
Barrier Free Access Ramp	Minimum front yard setback of 0.8 m	0.1 m front yard setback	No

The proposed ZBA proposes to rezone the Site to a High Density Residential 7 Zone (RH.7-XX) which will remove Holding Symbol H1 and add the following site-specific regulations to:

- Permit a Post-Secondary School Residence as an additional permitted use which shall be defined as: “*Post-Secondary School Residence*” means the whole of an apartment building consisting of dwelling units primarily intended for post-secondary school students;
- Increase the maximum density from 150 units per hectare to a maximum density of 425 units per hectare for a Post-Secondary School Residence;
- Reduce the minimum Front Yard Setback from 6 m to 4.3 m;
- Reduce the minimum Interior Side Yard Setback along east interior lot line from 7.5 m to 5.5 m;
- Permit a retaining wall 0.2 m from the east lot line and the rear lot line;
- Reduce the minimum rear yard setback from a minimum of 7.5 m to 5.5 m;

- Reduce the minimum buffer strip along east interior lot line from 3 m to 0.2 m;
- Permit a retaining wall and transformer within the required buffer strip along the rear lot line;
- Increase the maximum floorplate size from 1,200 sq.m for the 7th and 8th floor to 1,600 sq.m for the 7th storey and 1280 sq.m for the 8th storey and from 1,000 sq.m for each storey above the 8th floor to 1,100 sq.m for the 9th storey;
- Reduce the minimum building setback from 3 m for all portions of the building above the 6th storey facing a street for buildings located within 15 m of a street to 2.0 m for all portions of the building above the 7th storey facing a street for buildings located within 15 m of a street;
- Reduce the minimum active entrances required from one (1) active entrance for every 30 m of street line for the portion of the building facing the street (two required) to one (1);
- Reduce the minimum rear and interior side yard setback of the tower portion of a building from 12.5 m to 5.5 m from the east interior side lot line and 5.5 m for the rear lot line and 9.5 m for the west interior side lot line measured perpendicularly from the exterior wall of the 6th storey;
- Reduce the minimum common amenity area requirement from 20 sq.m per dwelling unit to 16 sq.m per dwelling unit;
- Increase the maximum angular plane adjacent to an RL.1 zone from 30 degrees to a maximum of 61 degrees;
- Permit a minimum parking size of 2.75 m x 5.5 m;
- Permit a drop off/ pick up parking space within the front yard setback (1.65 m from the front lot line) whereas no parking spaces are permitted in the front yard;
- Permit a driveway/ ramp setback from the building of 0 m whereas a minimum setback of 3 m is required adjacent to habitable rooms;
- Apply a minimum parking rate of 0.42 parking spaces per dwelling unit for a Post-Secondary School Residence. A minimum of 20% of the required parking spaces shall be for the use of visitor parking;
- Increase the maximum encroachment of exterior stairs from 1.5 m into the front yard and a minimum setback of 0.8 m from a front lot line to a maximum encroachment of 4.10 m into the front yard and a minimum front yard setback of 0.2 m; and
- Increase the reduce the minimum front yard setback for a barrier free access ramp from 0.8 m to a minimum of 0.1 m.

A draft of the Zoning By-law Amendment is included in this report as **Appendix C**. The ZBA is appropriate and desirable for the reasons described below:

Use

The application proposes to add a Post-Secondary School Residence as a permitted use, defined as an Apartment Building consisting of dwelling units primarily intended for post-secondary school students. This use is appropriate for the Site because it is a specialized form of residential development designed to meet the unique housing needs of students. Unlike conventional Apartment Buildings, Post-Secondary School Residences provide purpose-built accommodations with unit sizes, layouts, and amenities tailored to student living, including study and communal spaces. By focusing on student occupancy, the use supports the local post-secondary institution, aligns with municipal objectives to facilitate educational infrastructure, and reduces pressures on the general rental housing market. Furthermore, the proposed use is compatible with surrounding land uses and is consistent with planning policies that encourage the provision of student housing as a distinct residential type.

Density

A site-specific provision is requested to increase the maximum density to 425 units per hectare for a Post-Secondary School Residence. The requested density is appropriate given the Site's immediate proximity to the University of Guelph, allowing students to benefit from close, safe access to campus and convenient connections to the rest of the City by way of public transit. The proposed density is consistent with the densities observed in other high density residential developments located close to post-secondary institutions, as demonstrated by the **Appendix A** case studies from comparable municipalities.

The increase applies specifically to a purpose-built Post-Secondary School Residence, which functions differently than a conventional Apartment Building by serving students with a range of bedroom configurations, smaller overall living quarters, and shared amenities, minimizing impacts on the broader rental market. Should a traditional Apartment Building be proposed, it would remain limited to a maximum density of 150 units per hectare. The proposed density is supported by the overall site design, including parking and municipal servicing, as confirmed by the Functional Servicing, Parking, and Urban Design Reports. The density makes efficient use of municipal infrastructure, aligns with Official Plan policies supporting specialized residential forms, and is compatible with surrounding land uses.

Setbacks

A site-specific provision is requested to reduce the minimum front yard setback from 6 m to 4.3 m. This adjustment enables a vibrant streetscape along College Avenue East, with grade-level common amenity spaces and floor-to-ceiling glazing along the southeast portion of the building. The streetscape currently features varied front yard setbacks, and the proposed setback, combined with thoughtful landscaping and architectural detailing, will integrate positively with the surrounding community. The 4.3 m setback balances functionality and aesthetics, providing adequate space for landscaping, pedestrian pathways, utilities, and sightlines, while enhancing the visual and social vibrancy of the streetscape.

The ZBA requests a site-specific provision to reduce the minimum interior side yard setback along the easterly lot line from 7.5 m to 5.5 m. This reduction allows the westerly interior side yard to maintain a 9.5 m setback, providing greater separation from the existing single detached dwelling to the west. The proposed 5.5 m easterly setback does not adversely affect the adjacent property, which is a parking lot, and maintains appropriate spacing, sightlines, and functionality for the Site.

The ZBA requests a site-specific provision to reduce the minimum rear yard setback from 7.5 m to 5.5 m. Rear yards often serve to provide outdoor amenity spaces and provide separation between adjacent uses. The Site's outdoor amenity spaces are provided internally within the courtyard and adjacent to the west interior lot line. The rear lot abuts a golf course, which is an open, non-residential use that will not be adversely affected by the proposed setback. The rear lot area is proposed to accommodate an infiltration gallery along with landscaping, which will create a clear delineation between the Site and the Cutten Fields golf course. The final engineering and landscape design will be approved through the Site Plan Approval process. The reduced rear yard setback is appropriate and allows for an efficient site design while maintaining adequate separation between the uses.

A site-specific provision is requested to permit a retaining wall to be located 0.2 m from the east interior lot line. This also necessitates the requirement to reduce the buffer strip requirement along the east property line to 0.2 m from 3 m to accommodate the retaining wall and the existing driveway curb cut. The retaining wall will function as a fence with the addition of a guard rail designed to align with the Ontario Building Code (OBC) requirements, providing a visual and physical separation between the Site and the adjacent property. East of the lot is occupied by the golf course maintenance area and employee parking lot, and the reduced setback will not result in any adverse impacts on access, safety, or usability. The location of the retaining wall maximizes the site functionality while maintaining appropriate screening, sightlines, and compatibility with the surrounding

context. The requested relief achieves the intent of the buffer strip while facilitating the efficient and functional development of the Site.

A site-specific provision is requested to permit a retaining wall to be located 0.2 m from the rear lot line and to permit a retaining wall and transformer within the buffer strip. The rear of the property abuts a golf course, which is a non-sensitive open space use. The intent of the buffer strip to provide a visual and physical separation between the Site and adjacent uses is still achieved, as the proposed retaining wall and transformer are functional, non-habitable infrastructure elements that do not general land use conflicts.

The retaining wall is required to retain existing and proposed grades necessary to accommodate the proposed infiltration gallery, which supports appropriate stormwater management for the Site. The transformer is proposed within the buffer strip to efficiently service the Proposed Development while minimizing impacts to the Site's internal circulation, building layout, and landscaped amenity areas. Its location at the rear of the property, adjacent to a non-sensitive open space use, reduces visibility and potential impacts on public-facing areas. Given the adjacent land use, the functional necessity of the infrastructure, and the continued achievement of the buffer strip's intent, the requested site-specific provisions are appropriate.

Stepbacks

The Zoning By-law requires a minimum stepback of 3 m for all portions of a building above the 6th storey that are located within 15 m of a street. A site-specific provision is requested to reduce the minimum stepback to 2.0 m for portions of the building above the 7th storey facing a street. The proposed design incorporates an angled building form and a varied palette of materials, including glass, wood, and metal panels, which collectively reduce perceived mass, provide visual interest, and maintain a human scale at street level. Due to the unique angled building design, portions of the building above the 7th storey ultimately exceed the 3 m stepback requirement, further mitigating impacts on the streetscape. These design strategies maintain the intent of the stepback by reducing shadowing and breaking up continuous bulk, while enabling a functional high-density building that responds to site constraints and the surrounding context. Active frontage, grade-level amenity spaces, and landscaping further enhance the pedestrian experience and streetscape vibrancy.

Active Entrances

The Zoning By-law requires one (1) active entrance for every 30 metres of street frontage along the portion of a building facing a public street. This requirement is currently subject to an Ontario Land Tribunal appeal (OLT-23-000462).

The proposed building has a street frontage of approximately 46.6 metres, which would result in a requirement for two (2) active entrances. A site-specific zoning provision is requested to permit one (1) active entrance.

The intent of the active entrance requirement is to enhance street level engagement and support a pedestrian oriented public realm. This intent is achieved through the proposed ground floor design, which includes indoor amenity space oriented to the street and large windows that provide transparency, passive surveillance, and visual interaction with the public realm. These elements contribute to an active and animated streetscape despite the reduced number of entrances.

Given the modest building frontage, the proposed ground floor layout, and the continued achievement of the intent of the regulation, one (1) active entrance is appropriate.

Tower Separation

The ZBA application requests to reduce the setback of the tower portion of the building at the 6th storey along the east interior and rear lot line from a minimum of 12.5 m to 5.5 m and from 12.5 m to 9.5 m on the west interior lot line.

The intent of the tower separation requirement is to minimize overlook, preserve privacy, reduce shadow and massing impacts, and ensure appropriate spacing between tall building elements and adjacent uses.

The east interior lot line abuts a parking and the golf course maintenance area, and the rear lot line abuts a golf course, both of which are low-sensitivity land uses with no residential windows or private amenity areas that would be affected by reduced tower separation. As a result, the potential for overlook or privacy impacts is minimal. The west interior side yard abuts an existing single detached dwelling. The shadow diagrams demonstrate that the shadows impacts on the property to the west are appropriate. Intentionally, there are no balconies proposed along the west elevation, eliminating potential overlook onto the adjacent low density residential property. A tree buffer strip is also provided along the west interior lot line further mitigating visual and privacy impacts and softening the built form transition. The proposed tower placement does not introduce unacceptable shadowing or visual impacts on adjacent residential use.

In addition, the building design incorporates setbacks, angled massing, and careful window placement that further limit overlook and reduce perceived bulk at upper storeys. The tower separation functions as intended by protecting privacy and maintaining appropriate built form relationships, despite the reduced numerical setback.

Floorplates

A site-specific provision is requested to increase the maximum floorplate size from 1,200 sq.m to 1,600 sq.m for the 7th storey, 1280 sq.m for the 8th storey, and from 1,000 sq.m to 1,100 sq.m for the 9th storey. This provision was introduced under Zoning By-law (2023)-20790 and is currently under appeal (OLT-23-000462). The Zoning By-law limits upper-storey floorplate sizes to manage building massing, reduce perceived bulk at higher levels, mitigate impacts related to shadowing, overlook, and compatibility with surrounding uses, and encourage articulated upper-storey forms that avoid uniform or slab-like building expressions and contribute to a varied and visually engaging skyline.

The Proposed Development seeks a reasonable increase in the permitted upper-storey floorplate sizes to support a more cohesive and well-designed building form. Instead of stepping back the building in flat, horizontal layers, the upper storeys are angled as the building rises. This allows the building to gradually pull away from the street and adjacent properties, reducing the visual impact of the massing.

This approach is appropriate given the Site's context, which includes large areas of open space (golf course) to the north and the University of Guelph as well as an arterial road to the south. These conditions reduce sensitivity to upper-storey massing and limit potential impacts on surrounding uses.

The angled stepback helps break up the building's presence along College Avenue East by reducing the appearance of a continuous vertical wall. It also increases the perceived separation from the interior side yard by avoiding a parallel relationship with the adjacent low-density residential property, further improving compatibility.

As a result, although the upper-storey floorplates are slightly larger than the numerical limits, the building reads as a graduated and sculpted form, rather than a bulky or monolithic volume. Importantly, the effectiveness of this approach is demonstrated through the building's performance. Shadow Drawings confirm that the site design results in minimal incremental shadow impacts on adjacent low-density residential property and the public realm. This indicates that the increased floorplate size does not compromise access to sunlight or sky view, which are central objectives of the floorplate regulation.

The proposed floorplate size also supports efficient unit layouts, internal circulation, and shared amenity spaces that are appropriate for a purpose-built student residence. Further reductions to the floorplate would not materially improve built-form outcomes and could undermine the functional quality of the building.

Common Amenity

The Zoning By-law requires each dwelling unit in an Apartment Building to have a minimum of 20 sq.m of common amenity per dwelling unit, totaling 3,060 sq.m for 153 units. This requirement is subject to appeal OLT appeal (OLT-23-000462). A site-specific provision is requested to allow the Site to provide a minimum of 16 sq.m of common amenity per dwelling unit (totaling a minimum of 2,448 sq.m). While the current design proposes approximately 2,477.05 sq.m of common amenity space, minor adjustments may occur through detailed design. The requested provision is intended to provide appropriate design flexibility. The Site is located directly across the street from the University of Guelph and its premium athletic facilities and is designed specifically to serve a student population. The proposed on-site common amenity program includes a range of indoor and outdoor spaces tailored to students, including a theatre room, study rooms, yoga and fitness spaces, an event room, and an outdoor courtyard and patio along the west lot line.

Common amenity spaces enhance residents' quality of life, foster a sense of community, and support recreational, social, and functional needs. In determining the appropriate amount of amenity space for this Development, careful consideration was given to the Site's proximity to external amenities, the student demographic, prevailing market trends, and the desired functionality and quality of the spaces. The proposed program provides high-quality, purpose-built amenities that complement student life, supporting learning, social interaction, and wellness while reflecting the specific needs of a post-secondary student population close to campus.

Angular Plane

A site-specific provision is requested to increase the maximum west angular plane adjacent to the RL.1 Zone from 30 degrees to a maximum of 61 degrees. This provision is introduced under Zoning By-law (2023)-20790, and is currently under appeal (OLT-23-000462).

The purpose of the interior side yard angular plane provision is to mitigate potential impacts such as shadowing and overlook while providing an appropriate transition to lower density residential uses. The shadow diagrams prepared by 5468796 Architecture Inc., confirm that the interior side yard shadows satisfy the City of Guelph Sun and Shadow Study Terms of Reference and are appropriate for the context. The Urban Design Brief prepared by GSP Group further confirms that the proposed built form and site design provide a suitable transition to the adjacent single detached dwelling.

The building is setback 9.5 m from the west interior lot line, exceeding the minimum required setback of 7.5 m. No balconies are proposed along the west elevation, eliminating potential overlook onto the adjacent property. A tree buffer strip is also provided along the west interior lot line in accordance with Table 6.33-D of the Zoning By-law, further mitigating visual and privacy impacts.

The Site is located on an arterial road directly across from the University of Guelph and is intended to accommodate a purpose-built Post-Secondary School Residence. Student housing is inherently oriented to locations in close proximity to campus to support safe, convenient access and reduce travel demand. Strict compliance with a 30-degree angular plane would significantly constrain the ability to develop the Site for high-density student housing and would not appropriately reflect the Site's proximity to the University of Guelph and arterial road context. The proposed angular plane maintains the functional objectives of the regulation while facilitating the efficient intensification of an underutilized Site in a strategic, transit-supported location.

Parking Location

The Proposed Development includes one (1) short-term pick-up and drop-off space at grade within the front yard setback a minimum of 1.65 m from the front lot line. A site-specific provision is required to permit this location. This request is appropriate because the space is limited, used only for brief stops, and has minimal impact on the streetscape, pedestrian circulation, or on-site traffic. Locating the space at grade avoids requiring vehicles to access the underground garage for short-term use, enhances safety and convenience, and ensures the Site functions appropriately by providing a designated area for pick-up and drop-off while maintaining the overall intent of the front yard setback.

Driveway Location

The Zoning By-law requires any surface driveway or parking area to maintain a 3 m setback from a building wall, entrance, or any window of a habitable room. The building includes a habitable room at its northwest corner. The adjacent driveway is a ramp providing access to the underground parking garage. To avoid ambiguity at Site Plan, a site-specific provision is requested to permit the driveway/ramp to have a minimum setback of 0 m from the building face where it provides access to the underground garage. This ensures proper site function while avoiding impacts such as light intrusion into habitable rooms or conflicts with vehicle circulation.

Off-Street Parking Space Size

The development is proposing underground parking stall sizes that comply with Table 5.2 Row 3 of Zoning By-law (2023)-20790. According to the City of Guelph's website, for areas still under appeal in Zoning By-law (2023)-20790, Zoning By-law (1995)-14864 should still be referenced. Since this provision is currently subject to appeal OLT-23-000462, a site-specific provision is requested to ensure that the underground parking stalls are permitted to be 2.75 m x 5.5 m in accordance with the 2023 Zoning By-law despite the appeal.

Parking

A rate of 0.42 parking spaces per dwelling unit is proposed for the Post-Secondary School Residence. The Zoning By-law does not include a rate specific to purpose-built student housing. The Apartment Building rate, 1.5 spaces per unit for the first 20 units and 1.25 spaces per unit thereafter does not reflect the typical parking demand for student-oriented housing, as students rely primarily on alternative forms of transportation such as public transit, cycling, and walking.

The Site is well-served by higher-order transit, including GO Transit, and has direct access to local bus routes, cycling infrastructure and pedestrian walkways. The intent of the parking rate in the Zoning By-law is to ensure that there will be sufficient parking on Site to meet the demands of the use. The Transportation Impact and Parking Study prepared by BA Group includes surveyed three comparable purpose-built post-secondary school residences (two in Waterloo and one in Guelph) in 2025 which concluded that a parking demand of 0.32 spaces per unit or less was observed during peak hours. This confirms that a rate of 0.42 spaces per unit will adequately accommodate parking needs on Site for a purpose-built student residence.

Bicycle parking is proposed at a rate exceeding the Zoning By-law requirements (subject to appeal OLT-23-000462), reflecting the higher reliance of student tenants on cycling and transit. Additional bicycle spaces ensure that the needs of both tenants and visitors are met while supporting sustainable transportation options.

Encroachments

A site-specific zoning provision is requested to increase the maximum encroachment of an exterior stair into the front yard setback from 1.5 m to 4.10 m and to reduce the minimum setback from the front lot line from 0.8 m to 0.2 m. This relief supports the creation of an exterior stair that can be fully constructed, accessed, and maintained on private property, avoiding encroachment into the public right-of-way or conflicts with the public realm. The stair responds to the Site's grading conditions and provides a critical pedestrian connection between the east side of the Site and the principal entrance. Given its functional necessity, minimal impact on the streetscape, and contribution to pedestrian circulation, the requested site-specific provisions are appropriate.

A site-specific zoning provision is requested to permit a barrier-free access ramp to be located a minimum of 0.1 m from the front lot line, whereas a minimum setback of 0.8 m is required. The ramp is necessary due to the Sites grading to provide accessible, barrier-free

access from the east side of the Site to the principal entrance. Its location will not negatively impact or encroach onto the public realm. Given its functional necessity, contribution to accessibility, and minimal streetscape impact, the requested site-specific provision is appropriate.

Removal of Holding Symbol (H1)

The ZBA proposes the removal of Holding Symbol 1 (H1) on 222 College Avenue East. City Engineering staff have advised that the Holding Symbol on 210 College Avenue East was removed in January 2025, however, this has not yet been reflected within the available consolidated Zoning By-law.

In accordance with Section 17.1.1 of the Zoning By-law, the H1 provision ensures that servicing agreements, payment for services, connections to municipal infrastructure is completed and any domestic wells are decommissioned prior to the intensification of the Site for an additional dwelling unit, bed and breakfast, day care centre, group home, home occupation or lodging house type 1.

To lift the holding provision, engineering servicing agreements, payment of the construction and installation of the sanitary sewer, connection to the municipal watermain and municipal sanitary sewer, and the proper removal of any domestic wells shall be completed to the satisfaction of the City.

During initial consultation with the City in April 2025, the engineering staff identified that to remove H1 it must be demonstrated that any domestic wells on the properties have been properly abandoned in accordance with the current MECP Regulations and Guidelines to the satisfaction of the City Engineer. All other conditions were previously addressed. Chung & Vander Doelen (CVD) confirmed that there are no records of any domestic wells on the properties. The Utility Locate Report prepared by Infrastructure Intelligence Services Inc., confirms that the Site has access to municipal services. As such, it is appropriate to request the removal of H1 through this ZBA application.

In conclusion, the proposed ZBA is appropriate for the Site and represents good planning. The amendment facilitates the development of purpose-built student housing, providing high-density accommodation across the street from the University of Guelph, where students can conveniently access campus, transit, cycling, and pedestrian networks. Concentrating student housing near campus supports efficient land use, the establishment of complete communities, reduces pressure on the broader rental market, and promotes sustainable transportation. The ZBA aligns with provincial and local policy by enabling the

intensification of an underutilized Site in a strategic location while maintaining compatibility with adjacent land uses and municipal infrastructure.

6. Overview of Supporting Studies

6.1 Functional Servicing and Stormwater Management Report

MTE Consultants Inc. was retained to complete a Functional Servicing and Stormwater Management Report (“FSSWM”) in support of the Proposed Development, Official Plan Amendment and Zoning By-law Amendment. This was identified by the City of Guelph during pre-consultation as a requirement for a complete application. The FSSWM identifies how the Proposed Development will be serviced including water, sanitary and storm connections to the existing City infrastructure.

6.1.1 Grading

Existing runoff partially drains northeast toward College Avenue East and southwest toward an adjacent golf course, with a 1.80 m elevation difference from west to east and south to north; College Avenue East slopes at approximately 6.5% across the Site’s frontage, and impervious coverage is 29.2%.

The Proposed Development includes a 10-storey residential building with access from College Avenue East and underground parking. The grading strategy maintains existing elevations along surrounding property lines and the right-of-way, incorporating swales to direct landscaped runoff to an infiltration gallery and a catchbasin for driveway drainage. Retaining walls are required along the northeast and north property lines due to elevation changes between proposed and existing grades. All elevations remain subject to revision during detailed design, with the strategy designed to divert water away from the building and route major storm overland flow northward toward the golf course.

6.1.2 Water

A new connection to the existing 300 mm diameter municipal watermain along College Avenue East is required to service the Proposed Development, with the final private water service size to be confirmed during detailed design but anticipated at 200 mm in diameter. The service line will tie into the watermain approximately 110 m northeast of the College Avenue East and East Ring Road intersection, entering the south face of the parking garage and extending to the service room. To ensure adequate pressure and flow for fire protection, a detailed fire flow assessment will be conducted during detailed design; preliminary calculations indicate the existing off-site fire hydrant on College Avenue East can supply a maximum of 16,500 L/min while maintaining the Ontario Building Code minimum of 140 kPa.

6.1.3 Sanitary

It is proposed that the Site will be serviced by a new 200mm diameter sanitary service complete with new manhole within the existing 200mm diameter municipal sewer on College Avenue East. The 200mm diameter sanitary service will enter the Site approximately 115.0m northeast of the College Avenue East and East Ring Road intersection. The private sanitary service is to be installed at a slope that provides depth for the servicing of the building while maintaining adequate capacity. The service size and inverts will be confirmed at detailed design.

6.1.4 Storm

A private storm sewer system will be installed on-site to collect runoff from the drive aisle, connecting into the underground parking structure and pumping it to the municipal storm sewer for discharge into the right-of-way. The existing catchbasin fronting the Site will be replaced with a catchbasin manhole, into which the private system will connect via a new 300 mm storm sewer.

The Proposed Development increases the Sites imperviousness from 29.2% to 79.0%, reducing annual infiltration from 392 m³/year in pre-development conditions (based on clay loam soils with poor infiltration rates) to a net loss without mitigation. Located in WHPA-B with a vulnerability score of 6, the site requires maintaining pre-development infiltration volumes, allowing only clean runoff from rooftops and landscaped areas (0.126 ha total) while prohibiting parking lot infiltration. Mitigation involves an on-site infiltration gallery capturing 15 mm of runoff, yielding 462 m³/year infiltrated volume and a net gain of 103 m³/year, installed at least 1.0 m above high groundwater.

6.2 Tree Inventory and Preservation Plan Report

Jackson Arboriculture Inc. prepared a Tree Inventory and Preservation Plan Report for the Proposed Development located at 210-222 College Avenue East and adjacent areas within 6 metres. The Report identified a total of 31 trees and 1 tree unit, with two species at risk identified: Kentucky Coffeetree (Trees 11 and 12) and eastern flowering dogwood (tree 30). Although these species fall under potential regulation by Ontario's Endangered Species Act, 2007, via O. Reg. 832/21 and O.Reg. 230/08, neither applies here due to the City of Guelph's location outside of the prescribed geographic ranges and natural habitats. The removal of 10 trees will be required to accommodate the Proposed Development all of which are within the Subject Property boundaries. Preservation of trees 1-7, 11, 12, 18-29, and 32 is feasible through stringent protection measures including:

- *Tree protection fence must be installed at the mTPZ distance as outlined in this report and on Sheet 1, prior to the commencement of demolition, unless noted otherwise in this report and on Sheet 1.*
- *Once tree protection fence has been installed it must not be moved, relocated or altered in any way (unless repairing fallen fence etc.) for the duration of the construction period.*
- *No intrusion into an area identified on Sheet 1 as a tree preservation zone (TPZ) is allowed at anytime during construction, unless noted otherwise in this report and on Sheet 1.*
- *No storage of machinery, construction debris, materials, waste or any other items is allowed within a TPZ.*
- *Any tree branches or roots that conflict with proposed development must be pruned by a Certified Arborist in accordance with good arboricultural practice.*
- *Tree protection fencing should be inspected by a Certified Arborist prior to and during construction to ensure that the fencing remains intact and in good repair throughout the stages of development.*

6.3 Phase I Environmental Site Assessment

A comprehensive Phase I Environmental Site Assessment conducted by Chung & Vander Doelen Engineering Ltd. (CVD) for the residential properties at 210-222 College Avenue East in Guelph, Ontario was completed on March 26, 2025. The Site was historically developed as agricultural land and later improved with mid-20th-century residential buildings amid surrounding institutional, commercial, and parkland uses, no actual or potential sources of contamination were identified on the Site or adjacent properties that could pose an environmental liability. CVD concludes that the potential for environmental liability is low, obviating the need for further investigative measures at this juncture; however, to mitigate operational concerns during any prospective renovations, demolitions, or excavations, it is advisable to implement management protocols for potential asbestos-containing materials and lead-based paints, while ensuring compliance with Ontario Regulation 406/19 for excess soil handling, as the Site's soil quality remains unassessed for reuse or off-site disposition.

6.4 Pedestrian Wind Comfort Assessment

RWDI completed a Pedestrian Wind Comfort Assessment to assess the potential wind impact of the Proposed Development in support of the Official Plan Amendment and Zoning By-law Amendment. RWDI's assessment of pedestrian-level wind impacts for the Proposed Development utilized computational modeling integrated with local wind climate data and

pedestrian comfort and safety criteria, revealing generally favorable conditions with targeted mitigations. Existing wind speeds already satisfy safety standards year-round, supporting intended uses without issue. The taller proposed building will redirect winds to ground level but is unlikely to adversely affect neighboring properties, while maintaining appropriate conditions at key areas such as main and secondary entrances and the central courtyard. Although minor zones near the building's exposed corners may experience uncomfortable speeds during winter, overall grade-level winds meet safety thresholds. On the Level 10 exterior amenity space, summer conditions are suitable for active use in most areas, but winter winds could become uncomfortable and potentially exceed safety limits, for which RWDI recommends specific wind control strategies to enhance usability.

6.5 Noise and Vibration Impact Study

RWDI also completed a Noise and Vibration Impact Study evaluating potential acoustic disturbances from transportation, nearby commercial and industrial uses, and stationary sources like the University of Guelph's Central Plant amid an existing residential context with similar student accommodations. While vibration sources in the vicinity proved negligible and thus warranted no further assessment, noise modeling revealed elevated sound levels from the Central Plant but emphasized that the Site's current residential designation and comparable setbacks for adjacent buildings ensure the development imposes no additional compliance burden on the facility. To mitigate these risks and promote occupant comfort, RWDI recommends installing central air-conditioning to enable closed windows, incorporating warning clauses in agreements about façade and amenity area exposures to traffic and industrial noises, erecting feasible perimeter barriers around outdoor spaces, and verifying the university's Central Plant's mitigation timeline alongside a clause alerting residents to potential audible emissions. Although quantitative evaluation of the development's self-generated noise on the Site and surroundings remains premature at this design stage, preliminary analysis indicates compliance with applicable criteria is achievable through acoustical design refinements prior to building permit issuance.

6.6 Transportation Impact Study

BA Group was retained to prepare a Transportation Impact Study to support the Proposed Development at 210-222 College Avenue East.

The recommended parking strategy for the proposed student-oriented residential development on the Site in the City of Guelph allocates a minimum of 0.42 vehicle spaces per unit, including 20% dedicated to residential visitors and accessible spaces compliant with Zoning By-law (2023)-20790, reflecting the predominant reliance of post-secondary students on transit, cycling, and walking for school-related and discretionary trips. This

approach, validated through analysis of parking demands at comparable student apartment buildings in Guelph and Waterloo, proposes 65 total vehicle spaces, comprising 52 resident, 13 visitor (including 4 accessible, 52 electric vehicle-ready, and 5 compact spaces) sufficient to meet anticipated needs without excess. Bicycle parking exceeds by-law requirements, providing 210 spaces (194 long-term and 16 short-term) against a mandated 174, while loading facilities include an east-side bay for waste, maintenance, and services, plus a dedicated moving area in the P1 garage level to separate operational and resident activities. The Site is projected to generate approximately 80 two-way person trips during weekday morning peak hours and 135 during afternoon peaks, with an adopted mode share comprising 25–30% vehicle trips (20 morning/30 afternoon), 38–41% transit trips (30/55), and the remainder active transportation, yielding effective vehicle trip rates aligned with those observed at a similar facility in Guelph at 601 Scottsdale Drive. Traffic volume forecasting incorporates allowances for regional growth, including the Guelph Innovation District and College Avenue East corridor, as verified with City staff, and evaluates study area intersections under existing conditions and future scenarios (2030 and 2035 background and total traffic). All intersections are anticipated to operate within capacity with acceptable levels of service, exhibiting negligible site-related impacts and requiring no signal timing or infrastructure improvements. Overall, the analysis confirms that the development's travel demands can be adequately accommodated by the existing transportation network, with on-site infrastructure suitably supporting user needs.

6.7 Urban Design Brief

The Urban Design Brief prepared for the proposed 10-storey post-secondary student residence building at 210-222 College Avenue East in Guelph provides a comprehensive evaluation of the development's alignment with the City's Official Plan policies, Urban Design Guidelines, and Built Form Standards. The Proposed Development includes 153 post-secondary residential units, 1,627.29 square metres of indoor amenity space, 849.73 square metres of outdoor amenity space, and 65 parking spaces, with 20% allocated to visitor vehicles and 210 bicycle parking spaces. The development seeks to intensify land use in a manner that aligns with the principles of sustainable, pedestrian-friendly, and context-sensitive urban design. The design incorporates a rectangular building layout, active frontage along College Avenue East, and a well-integrated public realm with landscaped streetscapes, enhanced pedestrian connectivity, and accessible design features.

Key features of the Proposed Development include:

- The proposed building integrates with the existing neighbourhood context, maintaining appropriate setbacks, at grade active street frontages, landscaped

buffers, and design transitions to adjacent low-rise residential areas. The building complies with angular plane requirements along College Avenue East and provides a contextually appropriate angular plane along the west internal side yard that aligns with the intent to ensure minimal impacts on surrounding properties.

- The building's orientation, inclusion of native and drought-resistant plantings, provisions for electric vehicle ready charging stations, and focus on bicycle parking promote sustainable living and active transportation.
- A balanced mix of indoor and outdoor amenities cater to diverse residents' needs. The proximity to parks, recreational facilities, and institutional amenities further supports the post-secondary residents' quality of life.
- Pedestrian pathways, active street edges, and articulated building façades enhance the streetscape, contributing to a vibrant and cohesive public realm. Features like architectural canopy, ample glazing, and ground-level amenities improve connectivity and engagement with the neighbourhood.
- The development is within 800 metres of the University of Guelphs Main Campus including the universities Centre Bus Loop, providing convenient access to broader retail, services, and employment opportunities, further reinforcing its walkability and integration into the urban fabric.
- Safety and accessibility are prioritized through clear sightlines, well-lit pedestrian pathways, and barrier-free design elements, ensuring the development supports inclusivity and mobility for all residents.

6.8 Energy Study

EQ Building Performance (EQ) has prepared an Energy Study for the Proposed Development. The report assesses pathways to achieve two tiers of energy efficiency exceeding typical Ontario Building Code performance, characterized as a pass/fail standard, by benchmarking against a standard code-compliant baseline and incorporating measures like fuel switching to electric systems. It contrasts the current design (Scenario 1) with high-performance (Scenario 2) and net-zero-ready (Scenario 3) options, estimating the SB-10 baseline via the City of Toronto Zero Emissions Building Framework, with results summarized in Table i of their report. Preliminary recommendations include advanced strategies such as district energy and solar PV, alongside resilience-enhancing design options warranting further feasibility and cost analysis.

6.9 Preliminary Scoped Hydrogeological Assessment

Chung & Vander Doelen completed a Preliminary Scoped Hydrogeological Assessment dated January 9, 2026, which included the installation of three monitoring wells on site on April 9–10, 2025, and determination of peak groundwater elevations on April 14, 2025, ranging from 338.40 to 343.26 masl across the Site. A Water Table Interpretation map, derived from these wells, appears in Appendix C of their report, with ongoing recording of fall and spring high groundwater levels to inform the design process. Hydrogeologists also performed three single-well response tests, yielding soil hydraulic conductivity values. For full details, consult the Hydrogeological Assessment, both dated January 9, 2026. The full year of monitoring will be provided to the City of Guelph prior to a decision on the application.

6.10 Geotechnical Investigation

Subsurface investigations by CVD were conducted at the Site via three boreholes (logs in Enclosures 1-3; terminology in Enclosure A) reveal a shallow fill layer in Borehole 3, sandy silt with trace gravel, clay, and rootlets extending to 1.45 m below grade, exhibiting very loose to loose density (SPT N-values 2-5 blows/300 mm) and moist to wet conditions (water content 11-18%), underlain across all boreholes by sand-silt till with trace gravel and clay, occasional cobbles, boulders, and sand seams, terminating at 12.45-12.80 m depths (grain size analyses in Enclosures 4-5). This till transitions from loose (upper ~2 m; N-values ~5 blows/300 mm) to compact-very dense (N-values up to 50 blows/75 mm) with depth, with damp-moist water contents (6-14%). Perched groundwater occurs at 0.9-2.6 m below grade (elevations 340.9-343.2 m) in the upper till, following topography with northerly-easterly flow and seasonal fluctuations (see Hydrogeological Assessment for monitoring data). For the proposed 10-storey residential development with one underground parking level (ground floor at 344.25 m; lowest parking at 337.58 m), these conditions underscore the need to address shallow loose zones and perched water to ensure foundation stability, as the till's variability challenges conventional assumptions of uniform dense glacial deposits.

7. Public Consultation Strategy

The *Planning Act* (O. Reg 178/16) requires applicants to submit a proposed strategy for consulting with the public with respect to the OPA and ZBA applications as part of a complete application.

It is proposed that public consultation for the respective applications follow the Planning Act statutory requirements and the City of Guelph's standard practices outlined in Section 10.18 of the OP. The following public consultation strategy is proposed:

- EM Guelph Developments Limited Partnership met with the immediate neighbour to the west (owner of 204 College Avenue East) via teams call in September 2025 to discuss the Proposed Development and share preliminary drawings. After the September 2025 meeting, a few follow up e-mails were exchanged. These discussions informed the design of the outdoor amenity/ planting strategy, amenity programming and locations and the building massing/ siting;
- The City will follow the public notification procedures as required by the Planning Act;
- The applicant will post a Notice of Application sign as required by the City that will be posted throughout the duration of the processing of the applications by the City of Guelph;
- It is our understanding that the City will provide the public access to all the materials submitted with this application;
- If additional public consultation and engagement is warranted or requested by Council, we are willing to meet with area residents and organizations; and
- Direct written responses to comments raised through the public consultation process will be provided to city staff and considered prior to Council making a decision.

8. Community Energy Initiative

The City of Guelph is committed to the United Nations Race-to-Zero campaign and has set targets for the whole community to reduce carbon emissions by 63 % against the 2018 baseline by 2030, with the goal of becoming a net zero carbon community by 2050.

The Guelph Community Energy Plan (“CEP”), adopted by Council in 2007, was the first of its kind in North America. It set a target for the city to reduce energy consumption by 50 % and greenhouse gas emissions by 60 % on a per-capita basis over 2006 levels by 2031. In 2009, the CEP became the Community Energy Initiative (“CEI”), signaling a transition from planning into implementation. To achieve the targets of the CEI, the plan includes three components:

- Build a community organization to co-lead CEI Implementation;
- Implement enabling activities to encourage community action; and,
- Implement specific technical actions with direct greenhouse gas reduction potential.

The Proposed Development has incorporated a variety of building and Site design features that support the City’s objectives for energy and water conservation, as identified within the 25 actions included in the CEI relating to the Proposed Development are noted below:

- Development of multiple underutilized low-rise residential lots with purpose-built post-secondary student resident units on a Site with access to full municipal services;
- The Site is within a 10-minute walking distance to the University of Guelph’s Centre Transit Hub and is well serviced by local and regional transit routes, promoting alternative modes of transit;
- The Site is proximate to the University of Guelph, encouraging a reduction in vehicle trips and overall dependence on vehicles;
- Short-term and long-term bicycle parking facilities are proposed which promotes active transportation and a reduced reliance on vehicles;
- 80% of the proposed parking will be designed electrical vehicle ready parking spaces;
- The Site is proximate to the University of Guelph’s main campus amenities providing active and passive recreational opportunities;

- There will be the completion of an energy model during design development to ensure it meets or exceeds SB-10 (building code requirements), and targets for energy and greenhouse gas reductions through the CMHC ACLP;
- High efficiency centralized heating and cooling based on 4-pipe fan coil system;
- Careful consideration will be given to management of noise levels generated by the development, including mechanical penthouse louvers, exhaust fans, transformer and other noise sources;
- LED lighting fixtures;
- The Proposed Development will satisfy the Ontario Building Code in terms of water efficiency and the use of water efficient fixtures for all future dwelling units. Future construction considerations may include but are not limited to low-consumption plumbing systems and EnergyStar compliant appliances;
- The Proposed Development will use high performance energy efficient building components, including but not limited to insulation, walls and windows, and will include the use of light coloured “high albedo” for upper floor and roof materials;
- Operable windows to promote natural ventilation;
- Of the 32 trees identified on and surrounding the Site only 10 are proposed to be removed located solely on the Site. The Proposed Development is committed to replanting an increased number of trees on Site which will enhance the Proposed Developments ecological value and exceed the City’s minimum replacement values;
- The landscape design will include the use of native and drought-tolerant species with minimal irrigation requirements; and
- The use of light coloured hardscape surfaces, including concrete walkways as well as ground-floor patio spaces, fixtures and amenity areas, will reduce potential heat island impacts. In addition, larger canopy trees integrated in the westerly at grad common amenity area will provide additional shading.

The Proposed Development aligns with the energy and water conservation policies outlined in Section 3.11 and Section 4.7 of the OP. Further, an Energy Strategy Report has been conducted by EQ Building Performance, which will inform on the detailed design process to produce a high efficiency envelope and how to mitigate demand on HVAC system.

9. Affordable Housing Study

The City of Guelph requires that all residential development applications address affordable housing. With regards to an Affordable Housing Study, the Affordable Housing Strategy states that:

“The proposed intent of the Affordable Housing Study is to:

- Make the applicant aware of the City’s 30% city-wide target, identified housing issues, and current annual affordable housing monitoring results;*
- Demonstrate how the proposal addresses the City’s affordable housing Official Plan goals, objectives and policies including targets and issues;*
- Provide staff with relevant information on the proposal to support the City’s affordable housing monitoring system; and*
- Provide staff with a measure of the potential demand and budget requirements for financial incentives.*

The proposed Terms of Reference for the Affordable Housing Study is to include the following:

- Planning rationale noting how the proposal is addressing the City’s Official Plan’s affordable housing goals, objectives, and policies, including targets;*
- Any relevant phasing issues, Site and contextual considerations that impact residential affordability;*
- Current annual rental and ownership benchmark prices (to be provided by the City);*
- Anticipated sale price and/or rental rates;*
- Anticipated percentage of units below and above the benchmark prices;*
- Number of residential units to be retained and/or removed if relevant;*
- Anticipated number of units and structure type(s), including number of bedrooms and description of unit finishing (example modest, high end);*
- Nature and amount of shared amenity space if relevant;*
- Who the units will be marketed to, example seniors, high end luxury, first time buyers, etc.;*

- *Anticipated tenure, including ownership (freehold), ownership (condominium), rental, and purpose-built secondary rental units;*
- *Relevant planning process/other applications; and*
- *Results of all pre-application discussions held with City staff.*

Consideration should be given to the following as potential means of lowering housing costs (i.e., sale price, rent):

- *Anticipated number of bathrooms in units including ensuites;*
- *Anticipated floor space in units and building common areas, if applicable; and*
- *Nature and amount of shared building amenity space in comparison to individual unit space, example decreasing individual unit sizes and increasing shared building amenity space.”*

9.1 Planning Rationale

Affordable housing is a key priority under the 2024 PPS and the OP. **Sections 5.2 and 5.3** of this report provide a detailed analysis of the applicable PPS and OP policy framework. The following summarizes the key policies as they relate to housing affordability and purpose-built student housing.

The PPS promotes complete communities with a mix and range of housing types to meet current and long-term population needs, including student housing. It requires municipalities to maintain a 15-year supply of lands for residential development, establish minimum affordable housing targets, support all forms of residential intensification, and ensure a diverse housing stock that serves a range of household sizes, incomes, needs, and age groups. The PPS explicitly recognizes student housing as a required housing option that municipalities must accommodate. In post-secondary communities such as Guelph, purpose-built student housing plays an important role in meeting housing demand associated with educational institutions while supporting broader affordability objectives. By providing dedicated rental housing designed to meet student needs, purpose-built student housing helps reduce pressure on the conventional rental housing market, particularly on low-rise housing forms that traditionally serve families, seniors, and lower-income households.

The City of Guelph OP reinforces these objectives, maintaining a 15 year residential supply and a three year supply of lands for intensification and redevelopment (Section 3.3). It sets a 30% affordable housing target for new development, including rental and ownership units (Section 7.2.1), and encourages flexible development standards to reduce construction and

operating costs (such as reduced parking rates). The OP further supports housing affordability by permitting and facilitating all forms of housing required to meet the social, health, and well-being needs of current and future residents, including housing related to educational uses. The provision of a range of housing types that meets the needs of the population is identified as a fundamental component of planning for complete communities

The City's Affordable Housing Strategy notes that, despite recent development increasing the supply of apartments and townhouses, affordability challenges persist, including a shortage of smaller rental and ownership units and limited primary rental supply.

The Proposed Development is strategically located near the University of Guelph and higher-order transit, making it well-suited to serve student rental demand. By providing appropriately sized, purpose-built units with secure tenure, the development accommodates students without depleting the conventional rental stock, thereby reducing competition for family-oriented and lower-income rental units. This supports housing choice, intensification objectives, and the efficient functioning of the broader rental market, contributing to the City's housing affordability goals. While not classified as affordable housing under the OP, purpose-built student housing achieves broader affordability outcomes by increasing rental supply and relieving pressure on other housing forms.

This proposal provides 153 dedicated student rental units, with a mix of two, three, and four bedroom units, in a compact, transit-accessible location across from the University. University full-time and part time enrolment has grown from 29,827 students in fall 2021 to 31,194 in fall 2022, with 31,627 students reported in 2023, and the University is planning for continued growth³. The ongoing growth in student numbers, combined with a limited supply of student residences, highlights the need for purpose-built student housing to relieve pressure on the City's broader rental market. By diverting student demand away from conventional housing, this development increases overall housing availability, contributes to a balanced rental market, and supports the creation of a complete community in Guelph.

9.2 Phasing and Site Context that Impacts Affordability

The Site is anticipated to be developed in a single phase and is strategically located on the north side of College Avenue East, an arterial road, directly across from the University of

³ Ontario Universities Fall Term Headcounts by Institution and Level of Study: [Table-3-Fall-Term-Headcounts-by-Institution-Level-of-Study.pdf](#)

Guelph. The Site benefits from convenient access to higher-order transit, including GO Transit, as well as direct access to many local Guelph Transit bus routes.

The Proposed Development consists of two- to four-bedroom rental units intended to meet the needs of post-secondary students. Its immediate proximity to the university and comprehensive transit access supports a more affordable student lifestyle by minimizing transportation costs and reliance on private vehicles.

The Site is well suited for redevelopment and can be efficiently developed without unnecessary or costly site constraints. There are no known natural or cultural heritage features that would limit development potential or affect project affordability. Ownership may consider engaging a salvage specialist to recover materials, potentially offsetting demolition costs. Overall, the Site's location and physical characteristics support a cost-effective, purpose-built student housing development.

9.3 Annual Rent Benchmark Prices

The City provides an annual update on affordable housing through monitoring reports. The latest, the Guelph Growth Management and Affordable Housing Monitoring Report 2024, states that the 2024 affordable housing rental benchmark price is \$1,588 per month (all units). To calculate the 2024 affordable housing benchmark, the less expensive method (market-based vs income-based) is used.

The market-based affordable rental price by unit for 2025 was as follows (City of Guelph Housing Affordability Strategy 2024):

- Bachelor: \$1,271
- One-bedroom: \$1,598
- Two-bedroom: \$1,740
- Three-bedroom plus: \$1,935
- Benchmark: \$1,588 (2024)

Income-based affordable rental benchmarks for 2024 do not appear to be available based on gross household income. As a result, the 2023 income-based affordable rental benchmark defined as 30 percent of gross household income at the 60th income percentile, as set out in Table 9 of the 2023 report has been applied. This benchmark equates to a monthly rent of \$2,050. As the applicable market-based benchmark rent of \$1,588 is lower

than the income-based benchmark, the market-based rate is used to establish the affordability benchmark for this analysis.

Primary rental units are purpose built rental apartments, while secondary rental units include accessory apartments and other units not originally constructed as rentals. The City's Official Plan sets a target that 1% of all newly constructed units over a rolling five-year period be purpose-built primary rentals that are affordable. The 2020 Monitoring Report noted that no purpose-built primary rentals constructed between 2015 and 2020 were rented at or below the applicable affordability benchmark. According to the 2025 Monitoring Report (based on 2024 data), the City is now anticipated to meet its 1% primary rental target in 2025, driven by recent development activity, including four affordable housing projects completed in 2022 totaling approximately 102 units. These developments improve the City's performance relative to its primary rental target and contribute to the availability of affordable rental housing in Guelph.

9.4 Anticipated Percentage of Units Below and Above Benchmark Prices

The Proposed Development will be operated as purpose-built rental housing intended to serve post-secondary students. At this stage of the project, unit rental rates have not yet been finalized, as they will be informed by detailed design, unit mix, financing structure, and operating costs determined at subsequent stages of the development process.

While secured affordable housing units, as defined by the City of Guelph OP, are not currently proposed, Ownership is committed to reviewing available affordability benchmarks and incentive programs to assess opportunities to support affordability outcomes within the project, recognizing that purpose-built student housing operates within a distinct rental market with different unit configurations and tenure patterns than conventional rental housing. To this end, the Ownership will investigate the applicability of available financial tools, including subsidies, incentives, and low-cost financing programs, that may support the delivery of more affordable rental housing or improved affordability outcomes.

In particular, the Canada Mortgage Housing Corporation ("CMHC") Student Housing mortgage loan insurance program and the Multi-Unit Loan Insurance (MLI Select) program will be explored. These programs encourage outcomes such as energy efficiency, accessibility, and relative affordability. They are currently accepting applications and will be considered as part of the project's financing and detailed design process to determine potential suitability and benefits.

Through this review, Ownership will assess opportunities to align the Proposed Development with broader housing affordability objectives while maintaining project

feasibility and the delivery of purpose-built student housing that responds to an identified housing need in the City of Guelph.

9.5 Number of Residential Units to be Retained and/ or Removed

The Site currently contains three single detached dwellings. This development will have a net increase of 150 units (153 units proposed).

9.6 Unit Description

The requested OPA and ZBA would permit the redevelopment of the Site with 153 units. At this time, approximately 15.7% of the units are proposed to be two-bedroom units, 22.9% three-bedroom units, and 61.4% four-bedroom units. While final unit sizing and finishes will be determined further into the design process, at this time the development is proposed to contain approximately:

- 24 two-bedroom units that are currently proposed to be 40.88 m² (440 ft²) in size;
- 35 three-bedroom units that are currently proposed to be 58.53 m² (630 ft²) in size; and
- 94 four-bedroom units that are currently proposed to be 76.18 m² (820 ft²) in size.

Both indoor and outdoor amenity spaces are proposed for residents. Common outdoor amenity areas are proposed on Level 1, and Level 10 and include a garden area, courtyard, and a roof top patio. Indoor amenity spaces are proposed throughout the building on Level 1- Level 10 (**Figures 5-6**) and include a theatre, fitness facilities (yoga, meditation gym), study rooms, cafe, and coworking lounges.

9.7 Marketing

The units will be marketed to post-secondary students as rental units.

9.8 Anticipated Tenure

The units are intended to be purpose-built rental while the tenants attend post-secondary school.

9.9 Planning Applications

This Affordable Housing Study has been submitted in conjunction with the OPA and ZBA. Site Plan Approval will be required prior to the issuance of a Building Permit.

9.10 Conclusion

In conclusion, increasing the supply and diversity of the mix of housing available will lead to a more competitive market which will allow for more affordable accommodations. Purpose built student rental housing will reduce the occupancy of students in other forms of housing throughout the City, resulting in additional housing options for all.

10. Conclusions

A formal Pre-Consultation meeting was held with the City of Guelph's DRC, where comments were provided outlining the requirements for making a complete application submission. This included the preparation of a Planning Justification Report. All other necessary reports, plans and studies have been completed and are included with this submission in support of the Proposed Development.

As outlined in this report, the Proposed Development represents good planning and is appropriate for the Site. This opinion is based on the finding that the Proposed Development:

1. Aligns with matters of provincial interest under the Planning Act, including the provision of a full range of housing options, making efficient use of land and infrastructure, and the promotion of complete, inclusive communities.
2. Is consistent with the Provincial Planning Statement, 2024, particularly policies that support intensification, transit-supportive development, and the delivery of housing in appropriate, well-serviced locations.
3. Conforms with the City of Guelph Official Plan, including policies that encourage compact urban form, intensification within built-up areas, and a diverse mix of housing types and tenures.
4. Results in a high-quality, well-designed development that is compatible with surrounding land uses and provides appropriate transitions to adjacent properties.
5. Delivers purpose-built student rental housing in a strategic location, responding to sustained post-secondary enrolment and demonstrated demand, while helping to relieve pressure on the City's conventional rental stock and established low-density neighbourhoods.

6. Contributes positively to the City's housing targets and affordability objectives by increasing overall rental supply and expanding the range of housing options available.
7. Can be adequately serviced by existing municipal infrastructure, subject to detailed technical review and appropriate quality control measures.
8. Is supportive of transit use and active transportation, consistent with policies encouraging reduced automobile dependence.
9. Implements the general intent of Zoning By-law (2023)-20790.

In conclusion, it is our professional planning opinion that the proposed Official Plan Amendment and Zoning By-law Amendment are appropriate, in the public interest, and represent good planning. The Subject Applications will facilitate the efficient redevelopment of an underutilized Site, deliver purpose-built post-secondary student housing in an appropriate urban context, support intensification and sustainable growth, and help address broader housing supply challenges in the City of Guelph, while respecting the surrounding urban fabric.

Respectfully submitted,

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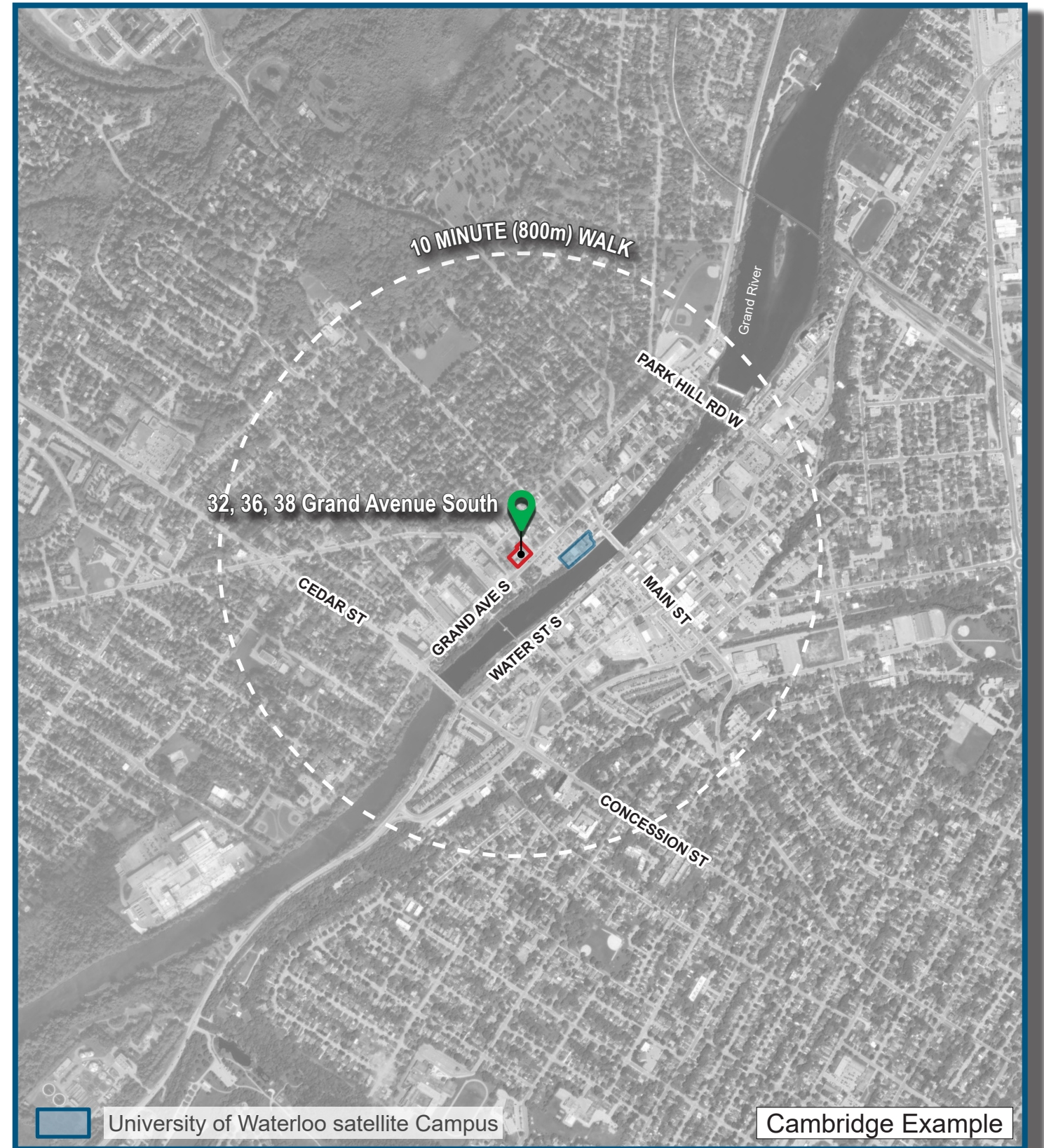
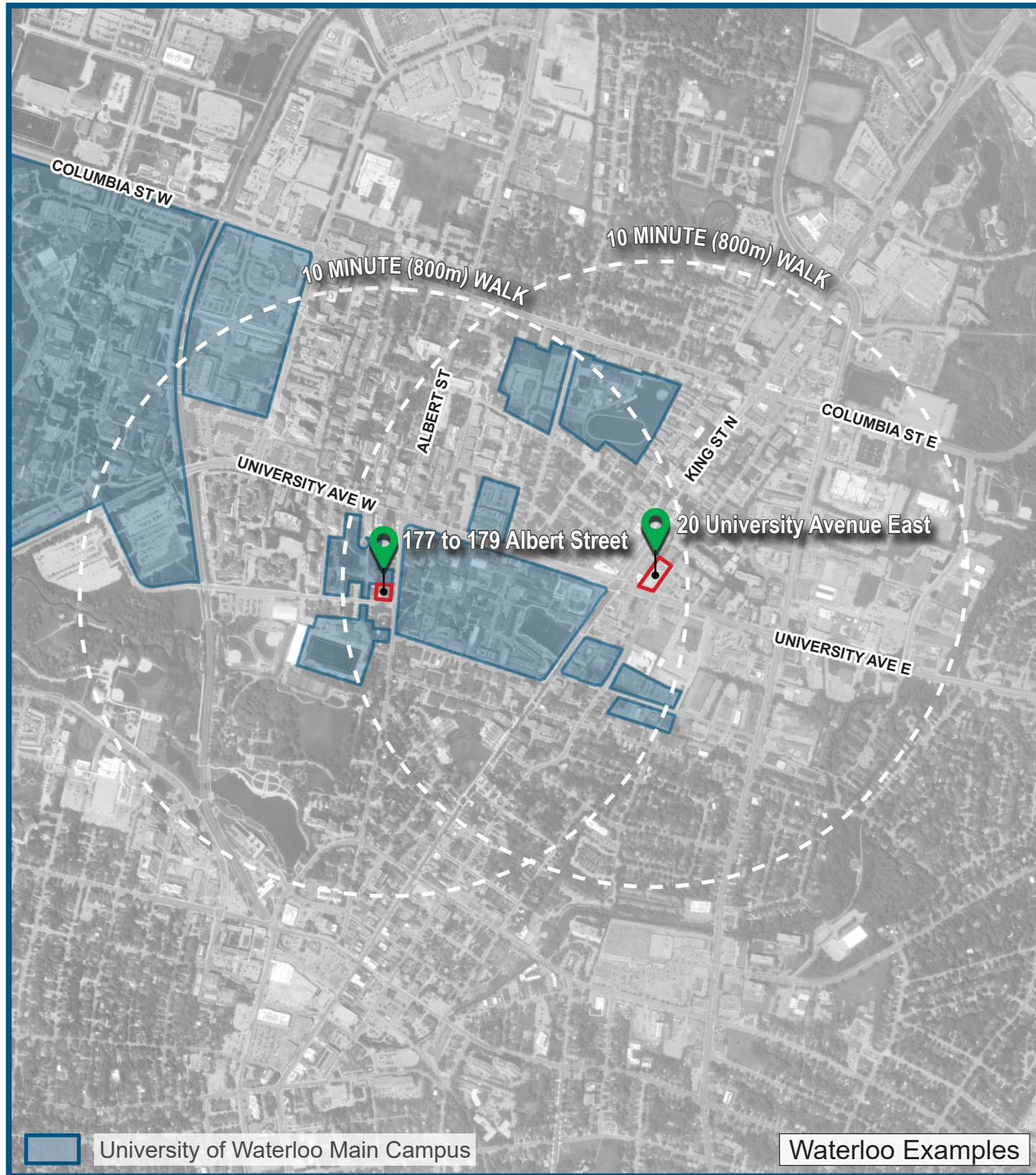


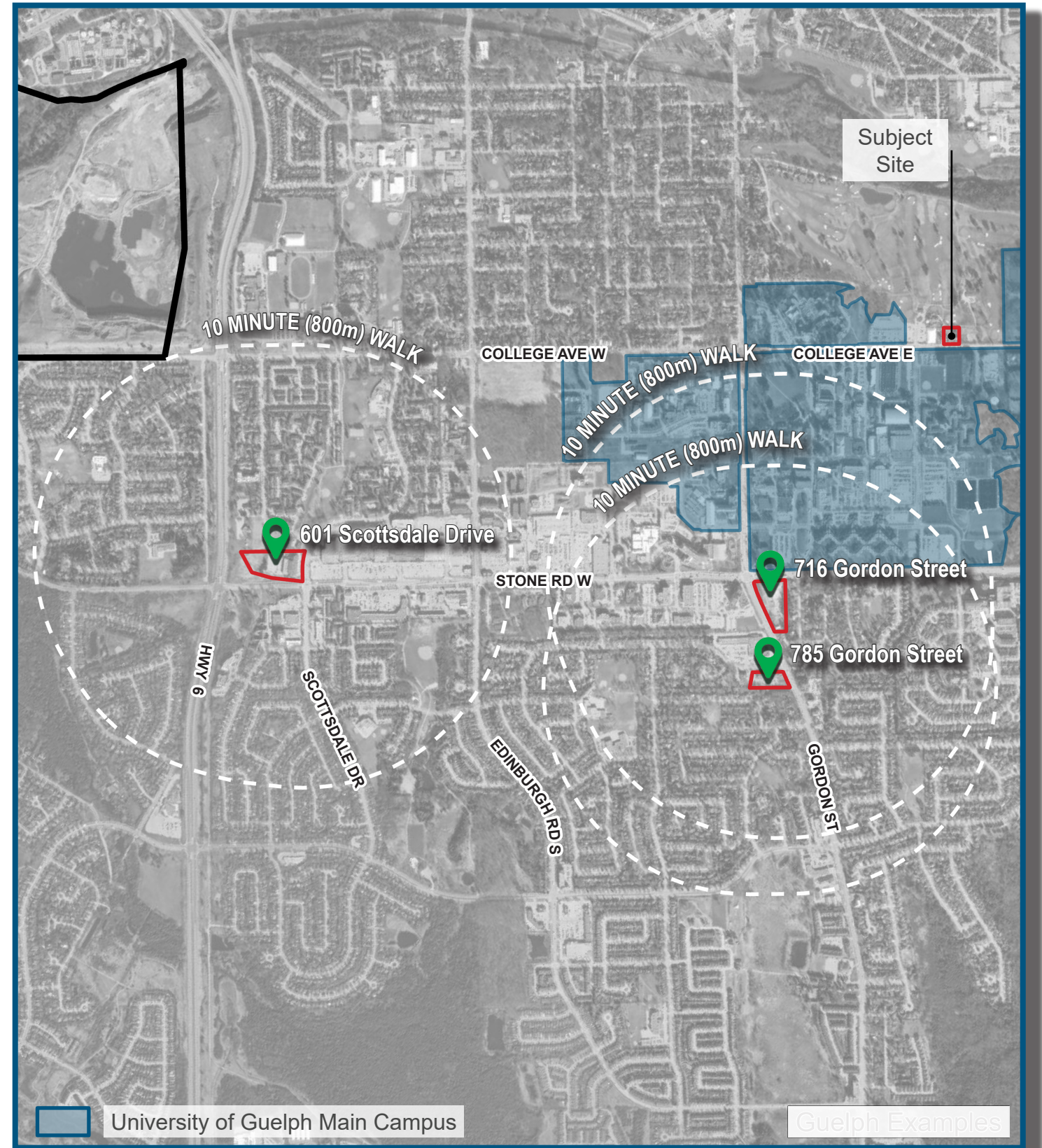
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Appendix A – Building Height and Density Case Studies

Examples of Projects in Cities with Close Proximity to Universities									
	SUBJECT SITE	e.g. 1 Private Development	e.g. 2 Private Development	e.g. 3 Private Development	e.g. 4 Private Development	e.g. 5 Private Development	e.g. 6 Private Development	e.g. 7 Private Development	e.g. 8 Private Development
Address	210-222 College Avenue East, Guelph	177 to 179 Albert Street, Waterloo	20 University Avenue East, Waterloo	32, 36, 38 Grand Ave. South, Cambridge	525 Princess Street, Kingston	555 Princess Street, Kingston	785 Gordon Street, Guelph	716 Gordon Street, Guelph	601 Scottsdale Drive, Guelph
Proximity to University Main Campus	25m +/- to UofG	20m +/- to UofW	106m +/- to WLU	100m +/- to UofW - Cambridge	600m +/- to Queens University	600m +/- to Queens University	410m +/- to UofG	40m +/- to UofG	1,115m +/- to UofG
Type of Application	OPA/ZBA Application Ongoing	OPA/ZBA - Council Approved 2025	ZBA Approved 2024	OPA/ZBA - OLT	ZBA (deemed complete 2025) - Under Review will go to council early 2026	ZBA Approved - SPA Review	OPA/ZBA - OLT Approved 2025	OPA/ZBA Approved 2024	OPA/ZBA - Approved 2024 CPPS - Ongoing
OP Growth Structure	Built-Up Area	Region of Waterloo: M TSA (Fig. 5a) City of Waterloo: Major Node and Station Area Boundary	City of Waterloo: Major Node	Built-Up Area	First Draft of the New OP - August 13, 2025: Strategic Growth Area	OPA 85 (2022-84) First Draft of the New OP - August 13, 2025: Strategic Growth Area	Strategic Growth Area	Strategic Growth Area	Strategic Growth Area
Zoning	Proposed: ZBL(2023) - 20790: RH.7 - XX	ZBL 2018-050 - (C292)(H)RMU-81	ZBL 2024-069 - (C270) C1-81	ZBL 150-85 - (F)C1RM1 Draft Comprehensive ZBL April 2025 - (F3)CMU1	ZBL 2022-62: WM1 (E83-84)	ZBL 2022-62: WM1 (E83-84)	ZBL(2023) - 20790: RH.7-4(PA)(H)	ZBL(2023)-20847, OPA (2023)-20845	Stone Road/Edinburgh Road CPPS - Site Specific Mixed Use Corridor 1 [MUC-2, (PA), (H12)]
OP Land Use	Residential Suites	Mixed-Use High Density Residential	Commercial	Community Core Area	Main street Commercial	Main street Commercial	Post Secondary School Residence / Commercial (Mixed-use)	Apartment / Commercial (Mixed-use)	Mixed-Use / Residential Suites
Classification of Street(s)	College Avenue East: Arterial	Major Collector: Albert Street	Regional Arterial: University Avenue East	Collector: Grand Avenue South	Arterial: Princess Street	Arterial: Princess Street	Gordon Street.: Arterial	Gordon Street.: Arterial Stone Road East: Arterial	Stone Road West: Arterial
Parking	0.41 Spaces / Post-secondary Student unit (65 Spaces Provided)	0.16 Spaces / Unit (37 Parking Spaces)	0.40 Spaces / Unit (106 Spaces)	0.45 spaces / Unit (150 spaces)	0.21 Spaces / Unit (67 Parking)	0.20 Spaces / Unit (35 Parking)	0.25 Spaces / Bedroom	0.54 Spaces / Units (303 Parking Spaces)	0.28 Spaces / Residential suite (191 Spaces Provided)
Density	425 UPH 153 Units Site Area Post Road Widening: 0.36079 ha	1,568 UPH - 2,885 BPH 231 Units (425 bedrooms) Site Area Post Road Widening: 0.1473 ha	750 UPH - 750 BPH 260 units (260 Bedrooms) Site Area Post Road Widening: 0.34674 ha	1,605 UPH - 1,605 BPH 328 Units (328 Bedrooms) Site Area Pre Road Widening: 0.2045 ha (Post 0.1927 ha)	810 UPH - 1,215 BPH 316 units (474 Bedrooms) Site Area: 0.39 ha	781 UPH - 1,164 BPH 172 units (256 Bedrooms) Site Area: 0.22ha	463 UPH - 548 BPH (724 Bedrooms)	311 UPH - 670.5 BPH 532 Units (1,150 Bedrooms) Site Area: 1.7151 ha	294 UPH - 347 BPH 653 Suites (764 Bedrooms) Site Area: 2.2ha
Building Height	10 storeys	30 Storeys	25 storeys	28 Storeys	10 Storeys	10 Storeys	11 Storeys	11 Storeys / 9 storeys	14 Storeys

Examples of Projects in Cities with Close Proximity to Universities





Appendix B – Draft City of Guelph Official Plan Amendment

PART A – THE PREAMBLE

Title and Components

This document is entitled '210-222 College Avenue East Site Specific Amendment' and will be referred to as 'Amendment No. XX'.

Part A – The Preamble provides an explanation of the Amendment including the Purpose, Background, Location, Basis of the Amendment and Summary of Changes to the Official Plan but does not form part of this amendment.

Part B – The Amendment forms Amendment XX to the Official Plan for the City of Guelph and contains the land use changes and specific text of the new policy introduced to the Official Plan for the City of Guelph through the Amendment.

Purpose

The purpose of Amendment XX is to change the land use designation of the Subject Property from “Low Density Residential” to “High Density Residential” land use designation, and to add a site-specific policy that would permit a maximum net density of 425 units per hectare for a Post-Secondary School Residence.

Location

The Subject Property affected by Official Plan Amendment XX are municipally known as 210-222 College Avenue East and are legally described as Part of Lot 5, Concession 2, Division 'G', City of Guelph. The Subject Property has an area of 3,607.81 sq.m. post road widening and are located on the north side of College Road East.

Basis of Amendment

The Official Plan Amendment application was submitted to the City of Guelph in conjunction with an application to amend the Zoning By-law.

Summary of the Changes to the Official Plan

The Official Plan Amendment will change the land use designation on the Subject Property from a Low-Density Residential land use designation to a High-Density Residential land use designation and will add a site-specific policy to permit a maximum net density of 425 units per hectare for a Post-Secondary School Residence.

Part B – THE AMENDMENT

This section of Amendment XX for 210-222 College Avenue East sets out the additions and changes to text and Schedule 2 in the Official Plan.

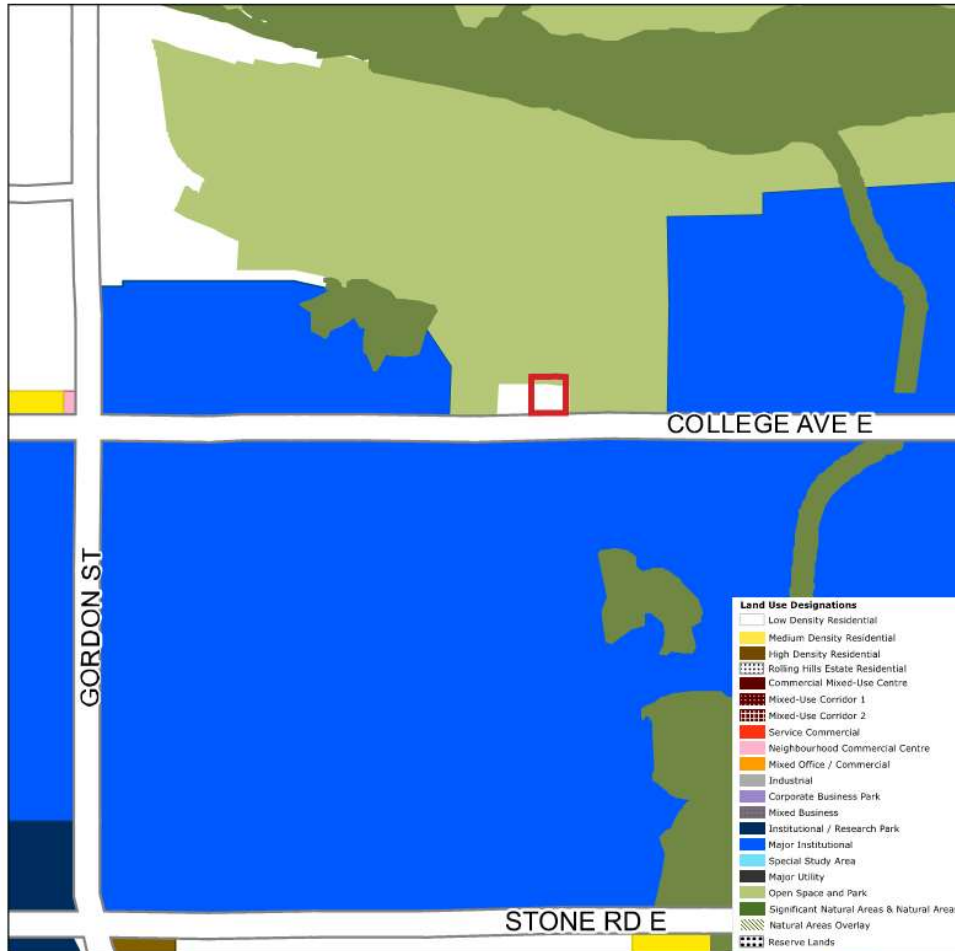
Implementation and Interpretation

Amendment XX is to be read in conjunction with the current Official Plan.

Details of the Proposed Amendment

The Official Plan for the City of Guelph is amended by changing the land use designation on Schedule 2: Land Use Plan for 210-222 College Avenue East from a Low-Density Residential designation to a High-Density Residential designation, as shown on the following excerpt from Schedule 2:

OFFICIAL PLAN AMENDMENT
TO THE
CITY OF GUELPH OFFICIAL PLAN
SCHEDULE 2: LAND USE PLAN



LAND TO BE REDESIGNATED FROM THE LOW DENSITY RESIDENTIAL TO THE HIGH DENSITY RESIDENTIAL INCLUDING A SPECIAL POLICY AREA

N.T.S
 JANUARY 2026

Appendix C – Draft City of Guelph Zoning By-law Amendment

The Corporation of the City of Guelph

By-law Number (20_) - XXXXX

A By-law to amend By-law Number (2023)- 20790, as amended, known as the Zoning By-law for the City of Guelph as it affects the lands municipally known as 210-222 College Avenue East and legally described as Part of Lot 5, Concession 2, Division 'G', City of Guelph, (File# XXXXX).

WHEREAS Section 34(1) and Section 36(1) of The Planning Act, R.S.O. 1990, c. P.13 authorizes the Council of a Municipality to enact Zoning By-laws and Remove Holding Provisions.

THE COUNCIL OF THE CORPORATION OF THE CITY OF GUELPH ENACTS THE FOLLOWING:

1. By-law Number (2023)-20790, as amended, is hereby further amended by rezoning lands municipally known as 222 College Avenue East from the Low Density Residential 1- Holding Symbol 1 (RL.1)(H1) and 210 and 214 College Avenue East from the Low Density Residential 1 (RL.1) to High Density Residential 7- Site Specific (RH.7-XX) zone.

2. Section 18.7, of By-law Number (2023)-20790, as amended, is hereby further amended by adding a new Subsection 18.7.XX for 210-222 College Avenue East as follows:

18.7.XX RH.7-XX

210-222 College Avenue East as shown on Defined Area Map 39 of Schedule A of this **By-law**.

a) Permitted **uses**

In addition to the permitted **uses** listed in Table 6.1(RH.7) **zone a Post-Secondary School Residence** shall also be permitted.

For the purposes of this **zone**, the following definition shall apply: "**Post Secondary School Residence**" shall mean the whole of an **apartment building** consisting of **dwelling units** primarily intended for post-secondary school students.

b) Regulations

In accordance with the provisions of Section 4 (General Provisions) and Section 6.3.9 (RH.7 Zone) of this **by-law** with the following exceptions and additions:

(i) Residential density – units per hectare (uph)

Despite Table 6.32, the maximum density shall be 425 units per hectare for a Post-Secondary School Residence

(ii) Front Yard or Exterior Side Yard

Despite Table 6.33, the minimum front yard setback shall be 4.3 m

(iii) Interior Side Yard

Despite Table 6.33, the minimum east side yard setback shall be 5.5 m

(iv) Rear Yard

Despite Table 6.33, the minimum rear yard setback shall be 5.5 m

(v) Retaining Wall

A retaining wall shall be permitted 0.2 m from the rear and the east interior lot line

(vi) Buffer Strip

Despite Table 6.33:

1. Along the east lot line the minimum buffer strip shall be 0.2 m; and
2. A transformer and retaining wall is permitted within the rear yard buffer strip.

(vii) Floorplate Sizes

Despite Table 6.34, the maximum floorplates shall be:

1. 1,600 sq.m for the 7th storey;
2. 1,280 sq.m for the 8th storey; and
3. 1,110 sq.m for the 9th storey.

(viii) Building setbacks (min)

Despite Table 6.34, building setbacks shall be a minimum of 2.0m for all portions of the building above the 7th storey facing a street for buildings located within 15 m of a street

(ix) Tower Separation

Despite Table 6.34, the tower portion of a building, shall be setback a minimum of 5.5 m from the east interior side lot line and the rear lot line and a minimum of 9.5 m from the west interior side lot line measured perpendicularly from the exterior wall of the 6th storey.

(x) Common Amenity Area

Despite Table 6.34, a minimum common amenity area of 16 sq.m. per dwelling unit shall be provided. The Additional Regulations (2)(3)(4) for Table 6.34 apply.

(xi) Angular Plane

Despite Table 6.35, the building height shall not exceed an angular plane of 61 degrees measured from the property line for the interior side yard lot line adjacent to RL.1 zone.

(xii) Active Entrances

Despite Table 6.34, a minimum of one (1) active entrance is required.

(xiii) Off-street Parking

1. In accordance with Table 5.2 Row 3 the minimum parking space dimension shall be 2.75 m x 5.5 m.
2. The minimum parking rate for a Post-Secondary School Residence shall be 0.42 parking spaces per dwelling unit inclusive of resident and residential visitor parking spaces. A minimum of 20% of the required Post Secondary School Residence parking spaces shall be reserved for the exclusive use by visitors.
3. A drop off/ pick up parking space shall be permitted in the front yard a minimum of 1.65 m from the front lot line; and
4. A driveway/ ramp shall be permitted to be 0 m from the building face where providing access to the underground parking.

(xiv) Encroachments

Despite Table 4.1:

1. The maximum encroachment of exterior stairs into the required front yard shall be 4.10 m and setback a minimum of 0.2 m from the front lot line; and
2. The minimum setback for a barrier free access ramp shall be 0.1 m from the front lot line.
3. Schedule A of By-law Number (2023)-20790, as amended, is hereby further amended by deleting Defined Area Map 39 and adding a new Defined Area Map 39 attached hereto as Schedule A.
4. Where notice of this By-law is given in accordance with the Planning Act, and where no notice of objection has been filed within the time prescribed by the regulations, this By-law shall come into effect. Notwithstanding the above, where notice of objection has been filed within the time prescribed by the regulations, no part of this By-law shall come into effect until all of such appeals have been finally disposed of by the Ontario Land Tribunal.

Passed this __ day of _____, 20__.

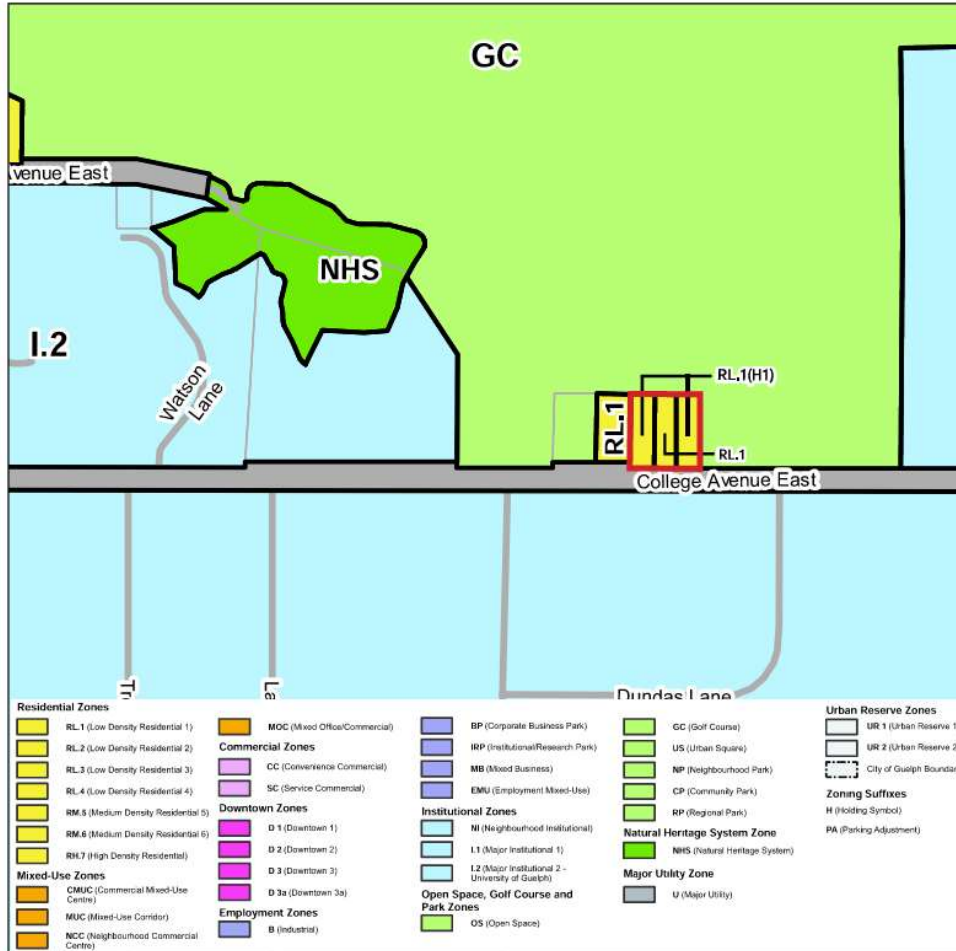
Schedules:

Schedule A: Defined Area Map 39

Mayor

Deputy City Clerk

SCHEDULE 'A'
ZONING BY-LAW AMENDMENT
 TO THE
CITY OF GUELPH
ZONING BY-LAW ___-___



HOLDING SYMBOL 1 ON 210 AND 222 COLLEGE AVENUE EAST TO BE REMOVED AND LANDS TO BE REZONED FROM LOW DENSITY RESIDENTIAL 1 ("RL.1") TO HIGH DENSITY RESIDENTIAL ("RH.7"), WITH SITE SPECIFIC REGULATIONS

*Holding symbol on 210 College Avenue East was removed in January 2025, but it has not yet been reflected within the Zoning By-law mapping.

N.T.S
 JANUARY 2026