

**Proposed Rezoning and Development at 151 Bristol
File No.: OZS21-011**

September 06, 2021

To Whom It May Concern:

We are writing to express our opposition to the proposed rezoning and development of the property at 151 Bristol Street. That this proposal is deeply flawed and should not go ahead is obvious to anyone who lives in the neighborhood or has ever visited the site. Nevertheless, it is extremely important that we take advantage of this opportunity to have our voices heard by an impartial City Council.

One of our neighbours outlined the main issues stemming from this proposal as follows (in no particular order):

- Density of neighborhood
- Character of neighbourhood
- Road width on Emslie St
- Building height
- Building orientation
- Parking
- Emergency vehicle accessibility
- Garbage pick up
- Environmental impact
- Water drainage
- Flood Plain

To us, the most pressing issues, and the ones that we feel most competent to speak about, flow from the first three: the current density and resulting character of this particular neighborhood and the inappropriateness of increasing traffic on Emslie Street. In the interest of space we will touch on the other issues only briefly or not at all.

Others have already written to you pointing out specific problems with this proposed development; in an effort to not just repeat what you have already read, we will focus our remarks on the text of the proposal itself; specifically the Justification Report (hereafter, the 'Report'). This is the section of the proposal that is not comprised of objective studies or assessments, but is a text written with the sole purpose of convincing the reader that this proposal is viable and should be given the go-ahead. There is nothing wrong with this, as the authors of the report are merely doing their job. But this means that the resulting report presents only one side of the story, and a highly biased one, at that. (Of course you could say the same thing about this letter, but the difference is that none of us are being paid to write these testimonials; we are doing it because we feel strongly about the undeniably negative impact that this project, if realized, would have upon our neighborhood.) The bulk of the Report is in fact comprised of carefully chosen quotations from three major sources: The City of Guelph Official Plan from March 2018; the Growth Plan for the Greater Horseshoe area (2020); and the Provincial Policy Statement (2020)—all of which are available online.

Any text can be made to support multiple, even contradictory, positions, and it is clear that the Report's case for this project relies almost exclusively on very specific interpretations of selected quotations from the source texts. Nothing about the Report suggests that the authors might have visited this neighborhood to judge firsthand the potential viability or wisdom of this proposed development. Living two lots away from 151 Bristol, we are much better placed to read the same source texts and judge whether or not their principles apply to the reality of this situation. (Since starting this letter I learned that two City councilors have agreed to visit the site prior to the Sept. 13 meeting; with the other two councilors who were good enough to attend an earlier outdoor neighborhood meeting, there will be at least four council members with firsthand knowledge of the location, which to us is prerequisite to passing judgment on this proposal.)

As the Report emphasizes, each of these source texts calls for increased development and intensification in the coming years for municipalities in this region, especially for a city such as Guelph. That said, the Report over-emphasizes these processes, over-generalizing their value, and mis-applying them to the particular location of 151 Bristol Street. In what follows we will touch on a sampling of specific points in the Report for which very different interpretations obtain if one has firsthand knowledge of the location.

For instance, section 3.1.3 of the Report, "Summary of PPS (2020) Policies" (p. 6) states that "[t]he proposed development of five (5) residential infill units on the subject property is consistent with the policies of the PPS 2020 insofar as it...provides intensification and redevelopment of an underutilized site." 151 Bristol is not "underutilized," however; the lot in question is zoned for a single dwelling and therefore five units in the same location would mean an egregious increase in density.

In another example, section 3.2 cites the "Guiding Principles" of the Growth Plan for the Greater Horseshoe (pp. 6-7), and "the policies of this Plan regarding how land is developed, resources are managed and protected, and public dollars are invested based on the following principles"; e.g. "Protect and enhance natural heritage, hydrologic, and landform systems, feature, and function." It is hard to see how natural heritage will be protected and enhanced, however, when the tree root system and canopy have already been eliminated from the site and the planned side yard clearance is a mere 5 cm on one side and 7 cm on the other (see below re the table on p. 15). It is implicit in the Growth Plan that the "landform system" features and the function of quarry sites should be respected and maintained, as far as possible. While the existing layout of houses along Emslie and Bristol does this, the proposed development flouts the topography of the old quarry, putting the house fronts on the Emslie side rather than Bristol, which is what the location dictates for lots that run the width of the block.

Section 3.2.2 "Managing Growth" (p. 7) cites section 2.2.1 of the Growth Plan, which "sets out policies for managing growth which include "provid[ing] a diverse range and mix of housing options, including additional residential units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes." The neighborhood already does this, but with a very different, much more organic, model of mixed housing that respects the original settlement and design concept of old Guelph.

Section 3.2.3 of the Report, "Delineated Built-Up Areas" (p. 8), cites section 2.2.2.3 of the Growth Plan, which states that: "All municipalities will develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will: "ensure lands are zoned and development is designed [sic] in a manner that supports the achievement of complete communities." This development is opposed by the great majority of people living around the site, and its construction would in practice prevent the achievement of a complete

community. On the contrary, this development would present a disruption to community well-being by greatly increasing congestion and potential hazards to a very narrow street and by eroding canopy, natural habitat, as well as the overall character and sense of identity of the whole neighborhood.

Section 3.7 contains policies for the “Built-Up Area and General Intensification,” including the following (p. 9): “Within the built-up area the following general intensification policies shall apply: ”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.” As pointed out already, the lot in question is **not** underutilized; it is zoned for a single dwelling with a considerable amount of greenspace. The project does not propose expansion or conversion of the existing buildings. If the existing primary dwelling plus garage were to be redeveloped and expanded, then a re-zoning would make perfect sense. The claim here is misleading: the lot is “underutilized” or vacant only in the eyes of a developer, not a citizen who cares about neighborhood character and identity, natural habitat destruction and over-cementification (to coin a phrase) of an extremely attractive part of old Guelph.

Moreover, as the text continues, “the City will identify the appropriate type and scale of development within intensification areas and facilitate infill development where appropriate” (p. 9). This phrase, “where appropriate,” recurs throughout these source texts. It is the responsibility of the city to consider carefully which type of urban legacy it intends to leave to future generations. As noted by all of us in our submissions, the type and scale of this development clashes with the neighborhood character, and goes overboard with intensification without taking into consideration a well-balanced redevelopment for a site that could constitute a future example of how excessive cementification is not the preferred route to take. Put simply, **the proposed development is entirely inappropriate for this location.**

Section 3.3.4: “Residential Development Policies” (p. 11): “The Residential development policies of the Official Plan are set out in Section 9.3.... The relevant objectives for the Residential designation include: “To ensure new development is compatible with the surrounding land uses and the general character of neighbourhoods.” This interpretation is readily contestable: except for the Wellington St. apartment buildings, which have exits onto Bristol and Wellington, and the apartment building at 68 Yorkshire (on the site of the old Holliday Brewery), which was built in accordance with the scale and planimetry of the original building, with well-planned and non-disruptive access and parking lot, there is nothing that resembles the proposed development in the neighborhood. To claim otherwise is simply false.

Section 9.3.1.1: “Development Criteria for Multi-Unit Residential Buildings and Intensification Proposals” (p. 11): “The following criteria will be used to assess development proposals for multi-unit residential development within all residential designations and for intensification proposals within existing residential neighborhoods. These criteria are to be applied in conjunction with the applicable Urban Design policies of this Plan. [...] Vehicular traffic generated from the proposed development will not have an unacceptable impact on the planned function of the adjacent roads and intersections.” This is a key concern, and this assertion is demonstrably false: there is no question that the impact of as many as ten extra cars (plus a number of visitors) will be extremely disruptive, and the failure of the city to address this will result in ongoing parking problems and congestion. Parking on Emslie is already banned (!), and five new dwellings with driveway exits on to a narrow secondary road will generate more traffic, disrupting snow removal, service and emergency vehicles, etc.

Section 3.3.6: “Urban Design Policies” (p. 13): “To ensure that the design of the built environment promotes excellence in urban design by respecting the character of the existing distinctive areas and neighborhoods of the city.” As noted now many times over, the design is out of character with this old Guelph neighborhood and will alter it irredeemably. Two or at most three single dwellings on the existing site would be acceptable; five townhouses with a total side garden clearance of **12 cm** (see below) is clearly an attempt by the owner-developer to maximize profit. The city would benefit from it as well in terms of revenue from taxing and service and the developer fees, but City Hall has the responsibility of leaving an urban legacy that can be regarded as enlightened and as a long-lasting example for future generations. This project is the opposite of an urban planning legacy.

Section 8.1.2 (of the City’s Official Plan) states (p. 13): “New development shall be integrated with the existing topography where possible to maintain the physical character of the area and minimize the amount of grading and filling required.” This project fully contravenes such principles. All the other houses in the area take this into account, which is the reason behind the great diversity in size, shape and appearance of the existing dwellings, which were built in harmony with the topographical make-up of the area, the pre-existing quarry, and the retaining walls system. Section 8.5 (of the City’s Official Plan) “sets out the policies for the built form for low rise residential policies” (p. 14): “Dwellings should be sited with a consistent setback to provide human scale streets. Designs should incorporate features such as prominent entrances and front porches to encourage social interaction and allow for views along the street.” This project does not promote such interaction. By contrast, two or, at most, three single dwellings, with sizeable gardens and greenery, would promote a healthy, interactive and diverse community.

Report section 3.3.7: “Summary of Relevant Official Plan Policies” (p. 14): The City’s “Official Plan generally supports intensification at higher densities on under-utilized lots for a range of housing types.” But an increase in use of 500%, which is what this proposal represents, is not efficient intensification; it is excessive and completely out of character with the neighborhood, favouring the car over the human being. It also obliterates the possibility of reconstituting a root system and a canopy of greenery after their destruction, which is a real concern, given that old-core Guelph canopy is endangered and needs to be preserved. This development as planned allows for minimal tree replacement, which is of great concern.

Finally, Report section 3.4.2: “Zoning Compliance” (p. 15): “The following table sets out [the] proposal’s compliance with the regulations of the R.3B Zone” (p. 15). The table (not reproduced here) demonstrates that the “Minimum Side Yard” distance would be 1.57 m in Unit 1 and 1.55 m in Unit 5 (at either end of the townhouse structure). The minimum required distance is 1.5 m; therefore each side of the proposed structure allows for a clearance of only 7 and 5 cm, respectively. Such close proximity to the homes on either side is completely out of synch with the neighborhood; every other house on the street has a side yard distance of well over 1.5 m. The proposal simply does not leave enough room to make these houses a decent solution. Two, or a maximum of three dwellings should be allowed on this lot, with sufficient green space for socializing and for organic urban living. The existing proposal clearly has no other rationale than to maximize profit for the developer/owner.

In closing, we hope that from the evidence presented herein, combined (ideally) with a visit to the site, it will be abundantly clear to Council that this proposal should be rejected outright.

Sincerely,

Russell Kilbourn and Sandra Parmegiani

