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RE: Policy Issues Regarding Street A Crossings of NHS in the Clair Maltby Secondary Plan

Dear Ms. Laughlin:

I thank you for your letter of June 23 2021. I welcome the decision to conduct a Class Environmental Assessment to determine the appropriate design for Gordon Street within the Clair Maltby Study Area.

There remains the issue of the proposed alignment and function of Street A which has three crossings of the NHS and, as proposed by the current version of the Secondary Plan, will function as a minor arterial to relieve through traffic flow on Gordon Street. These three crossings of the NHS are not allowed by the Official Plan unless there is no feasible alternative to these crossings that allows development of all land available for development.

Furthermore, construction of these crossings changes the function of Street A from the local-traffic function appropriate for a residential collector road to a through-traffic function which is contrary to City of Guelph policy for residential collectors.

Official Plan Policies regarding road crossings of the NHS

Notwithstanding the general principles that Official Plan policies should be viewed from the perspective of the intent of the OP as a whole and that where conflict exists among policies there should be consideration given to achieving a balanced outcome that respects the differing objectives, with regard to the differing objectives for protection of the NHS on the one hand and providing connectivity within the road system on the other hand the current Guelph OP has a strong prescriptive content that gives priority to protection of the NHS.

In Section 3.16 the Official Plan declares that an “environment first approach” is used in determining what is needed to “protect maintain enhance and restore” the Natural Heritage System. The OP, in policies 4.1.3. and 4.1.4, sets out the prescriptive requirement that only “essential transportation infrastructure” is permitted within natural heritage features and areas.

In keeping with the “environmental first approach” to considering the intrusion of only essential transportation infrastructure into the NHS the OP policy gives priority to environmental protection and rules out balancing environmental and connectivity impacts. The OP does this by

defining essential transportation infrastructure as: “Essential means: (1) there is a demonstrated need; and (2) it has been demonstrated that no other reasonable alternative exists”.

Demonstration that Street A crossings of the NHS are essential

I have raised the issue of road crossings of the NHS requiring demonstration that no reasonable alternative exists with City staff in July 2020 and again in March 2021. I raised the issue again during an Open House on Mobility Aspects of Clair Maltby in June 2021.

At the Open House the transportation team member, Emily Ecker, reported that the design team were recommending the Street A crossings of the NHS because if Street A did not continue across the NHS, it would be necessary “to provide extensive improvements to Gordon Street”. The design team considered it a better option to route some through traffic between Clair Road and Maltby to Street A rather than making extensive improvements to Gordon Street.

This response of the design team demonstrates that a reasonable alternative with no crossings of the NHS by Street A exists - improvements to Gordon Street. In the absence of demonstration that the NHS crossings of Street A are essential the proposed crossings contravene a central policy of the Official Plan – the Environment First approach – and should be removed from the Secondary Plan.

I also note that in addition to crossings of the NHS by Street A Schedule C of the OPA shows crossings of the NHS by Streets D and F. I have not previously raised the issue of these crossings also requiring justification as being essential but do so now.

Street A as a Collector Road for Local Traffic Only

It is City of Guelph Policy that the function of two-lane collector roads in residential neighbourhoods is to convey locally-generated traffic with through traffic discouraged. This policy is expressed in the City’s Traffic Calming Policy (2020) and is supported by the Canadian Guide for Traffic Calming

The CGTC, on which the TCP is based, states that the primary function of local streets is to provide access to property. Local streets are not intended to move through traffic within the overall road system. Residential collector roads provide access to property and in addition collect and distribute traffic moving to and from local streets. “As with local streets, collector streets are generally not intended to be through routes or to move significant amounts of traffic from one part of the road network to another.

Gordon Street and Victoria Road S are the two N/S arterial streets in the Clair Maltby Study Area. Through N/S traffic should be confined to these two arterial streets. Street A should be designed and function as a collector road for locally-generated traffic. Designing Street, A to function as a minor arterial is contrary to the City’s Traffic Calming Policy and to the Canadian Guide to Traffic Calming.

The three proposed crossings on the NHS by Street A change the function of Street A, which should be to convey locally-generated traffic only, to a through-traffic function connecting Clair

Road with Maltby. Removing the crossings of the NHS on Street A will restore Street A to its proper function as a collector street conveying locally-generated traffic.

The designation of residential collector streets as local-traffic only with through traffic discouraged has been City of Guelph policy since 1975. Prior to 1975 collector roads had been grouped with arterial roads and given the primary function of conveying through traffic. Unfortunately, the definition of the function of collector roads in the Official Plan has not been altered from the definition used in 1969.

I attach a full history of the changes in City Policy that have occurred since 1969 together with a revised definition of the function of residential collector roads that I suggest be included in the updating of the Official Plan that is underway.

Summary

Schedule C of the OPA for Clair Maltby shows six street crossings of the NHS (three on Street A, one on Street D and two on Street F).

None of the street crossings of the NHS has been demonstrated as essential.

Unless these street crossings can be demonstrated as essential with no reasonable alternative available that allows development these crossings must be removed from the Secondary Plan as the crossings are prohibited by the Official Plan.

An additional reason for removing the three crossings of the NHS by Street A is that allowing the crossings converts the function of Street A to a through-traffic street which is contrary to the City's policy for residential collector streets.

Best regards

Hugh Whiteley

EVOLUTION OF FUNCTION OF TWO-LANE COLLECTOR ROADS IN RESIDENTIAL AREAS IN PLANNING POLICIES - CITY OF GUELPH

(1) POLICIES IN PLACE PRE 1970

Prior to a review of roadway function and of the configuration of roads in new subdivisions that was undertaken in the early 1970's the City of Guelph's planning policies grouped all collector streets with arterial streets roads and assigned a through-traffic function to both collector roads. and arterial roads.

The 1969 Official Plan contained the following definition of the function of collector roads:

1969 Official Plan

3.2.2 Major Traffic Streets:

- 3.2.2.1** Arterial and Collector Streets are intended to serve major traffic movements within the Planning Area and to collect traffic from the local streets and to feed it to the Expressway system. This street system shall also serve to move volumes of traffic between various parts of the Planning Area.
- 3.2.2.2** Although these streets will provide a land service function in all future development, the traffic movement function of these streets shall be paramount.

(2) POLICY CHANGE IN 1975 OFFICIAL PLAN

By 1970 urban planners had become aware that through traffic using streets in residential neighbourhoods resulted in unnecessary environmental hazards and degraded the quality of life experienced by residents of the affected neighbourhoods. Responding to the negative impact of through traffic on streets in residential areas the City of Guelph altered the function assigned to two-lane collector roads in residential areas. Instead of grouping this class of collector roads with arterial roads and assigning a through-traffic function to residential collector roads the new policy grouped two-lane collector roads in residential areas with local roads. Under the new policy residential collector roads were given the functions of access to property, a function shared with local roads, and the added function of conveying local traffic generated from trips to/from local roads and from properties on the collector road to/from the arterial road system. Through traffic was discouraged from using residential collectors.

This new definition of the function of residential collector roads was described as follows in the 1975 Official Plan:

1975 Official Plan

With this arterial network, the collector system has been designed. The collector streets must relate to the arterial net, the physical features, the projected population density, the land use, and to the existing constraints while providing convenient access and preventing through traffic in the neighbourhoods and the conservation area. The designated collector streets in the Southview Planning District are:

(3) FUNCTION ON COLLECTOR ROADS IN THE CANADIAN GUIDE FOR NEIGHBOURHOOD TRAFFIC CALMING

In 1998 the Transportation Association of Canada (TAC) published the Canadian Guide for Neighbourhood Traffic Calming. This Guide grouped local roads and residential collectors together and assigned to them the function of conveying locally-generated traffic to and from the arterial road network. The Guide was updated in 2018 as the Canadian Guide for Traffic Calming. The 2018 Guide retained the local-traffic function for residential collector roads as shown in the extract below:

Canadian Guide for Traffic Calming 2018

1.4.1 – LOCAL AND COLLECTOR STREETS

A primary function of local streets is to provide access to adjacent properties. These streets are not intended for use as through routes or as corridors to move traffic within the overall road network. For collector streets, access to adjacent properties is balanced by a need to collect and distribute traffic travelling into and out of an area or neighbourhood. As with local streets, collector streets are generally not intended to be through routes or to move significant amounts of traffic from one part of the road network to another.

(4) RECOGNITION OF THROUGH-TRAFFIC HAZARD IN 2005 TRANSPORTATION MASTER PLAN

The 2005 Guelph-Wellington Transportation Master Plan acknowledged the need to discourage through traffic on residential collectors. One example is the reason stated for rejecting a southerly extension of College Avenue as a future new roadway:

2005 Transportation Master Plan

Through traffic on these residential collector streets and an indirect connection to the Hanlon Expressway will have a significant social and economic impact on area residents.

(5) RECOGNITION OF THROUGH-TRAFFIC HAZARD IN NEIGHBOURHOOD TRAFFIC MANAGEMENT POLICY

In 1998 City Council adopted a Neighbourhood Traffic Management Policy to be applied to local roads and to two-lane collector roads in residential neighbourhoods. The NTMP made explicit the policy of discouraging through traffic on local roads and residential collectors. The NTMP as revised in 2006 retained the local-traffic-only function of residential collector roads as outlined in the following section:

2006 Neighbourhood Traffic Management Policy

This policy document outlines procedures for initiating, reviewing and implementing neighbourhood traffic management plans in residential neighbourhoods to address traffic safety concerns related to speeding and high volumes associated with traffic short-cutting through residential neighbourhoods. This policy shall apply to local and two-lane collector roadways located within primarily residential neighbourhoods.

The use of traffic calming measures can reduce the speed and volume of traffic to acceptable levels, as determined by staff, and restore the roadway to its intended function. Additional benefits are increased traffic safety and liveability of the neighbourhood through the reduction of vehicular and truck traffic, occurrence of excessive speeding, noise, vibration, air pollution and collisions, while providing a safer environment for pedestrians and cyclists.

(6) CURRENT VERSION OF THE CITY OF GUELPH TRAFFIC-CALMING POLICY

In 2020 City Council adopted a revised Neighbourhood Traffic Management Policy under the title Traffic Calming Policy. The revised TCP retained the local-traffic function for two-lane collector roads in residential areas that has been in place in Guelph since 1975.

Traffic Calming Policy 2020

Collector road: Collector roadways with a maximum of 2 travel lanes in either direction. The primary function of a collector roadway is to help circulate traffic from within the neighbourhood out to the arterial road network.

(7) CURRENT OFFICIAL PLAN DEFINITION OF COLLECTOR ROADS

The current Official Plan for the City of Guelph (March 2018 Consolidation) has a definition of function for collector roads that reflects the policy of grouping collector roads with arterial roads and assigning a through-traffic function to collector roads. In 1975 the City removed the through-traffic function from two-lane collector roads in residential areas and adopted a local-traffic-only function for residential collectors. This change in function for residential collector roads has not been recognized in the OP definition of collector roads.

I suggest that as part of the updating of the Official Plan the definition for residential collector roads should be revised to correspond with the TAC (2018) Guide to Traffic Calming and the City of Guelph (2020) Traffic Calming Policy as outlined below.

CURRENT OFFICIAL PLAN

5.7.3 Collector Roads

1. Collector roads are intended to move low to moderate volumes of traffic within specific areas of the city and collect local traffic for distribution to the arterial or Provincial highway system.

IMPROVED DEFINITION OF 2 LANE RESIDENTIAL LOCAL AND COLLECTOR ROADS

Local Road A road providing access to property for local traffic; through traffic discouraged.

Collector Road A road for movement of local traffic and for access to property; movement of local traffic and access to property have equal importance; through traffic discouraged.

Arterial Road A road primarily for movement of through traffic; access to property of lesser importance.