

PRESENTATION TO GUELPH CITY COUNCIL MAY 16 2022

ISSUES TO BE ADRESSED IN APPROVAL OF CLAIR-MALTBY SECONDARY PLAN

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PRELIMINARY QUESTION 1: WHY ARE WE NOT PRESERVING ALL THE PARIS MORAINES AS PROTECTED GREEN SPACE?

In contrast to all other municipalities in Southern Ontario the City of Guelph has made the decision to convert large portions of the most scenic section of the Paris Moraine to high density urban built form. Before confirming this decision, I ask Council to explain why Guelph is the only Ontario City undertaking the difficult task of replacing this unique terrain by featureless building lots?

PRELIMINARY QUESTION 2: WHY IS PRIORITY BEING GIVEN TO GREENFIELD EXPANSION IN AN AREA THAT IS THE MOST EXPENSIVE TO SERVICE AND IS THE MOST DIFFICULT TO DESIGN FOR CARBON NEUTRALITY?

In amending the Official Plan by adopting OPA 54 City Council followed the suggestion staff to give priority to servicing of the Guelph Innovation District lands as the next greenfield development area. This was a wise decision since these lands are the least expensive lands to develop in terms of site preparation and construction of services. The configuration of the developable area allows for compact live-work-recreate neighbourhoods suited to the transition to the less automobile dependent life style needed to achieve the status of a carbon neutral city. The decision to give priority to Clair Maltby over the GID was not good planning and should be reviewed before Clair Maltby is approved.

PRELIMINARY QUESTION 3: WHY IS AN OFFICIAL PLAN AMENDMENT BEING MADE IN THE ABSENCE OF A POLICY FRAMEWORK FOR DESIGNING GREENLAND DEVELOPMENTS TO ACHIEVE CARBON REDUCTION GOALS?

In order to meet the carbon-neutral-community goals the City of Guelph has adopted we will collectively have to reshape the city and alter styles of living. Until there is a preliminary outline of what types of change and what extent of change is involved adoption of old-fashioned automobile dependent development proposals such as the current proposed forms in OPA 79 should be delayed.

DISCUSSION OF ISSUES AROUND APPROVAL OF OPA 79 NOW

ISSUE 1 LACK OF ADEQUATE CONSIDERATION OF ACHIEVING SUSTAINABLE COMMUNITY GOALS

There are two major goals that must be taken into account in planning Guelph's future. One goal which the City must meet by law, (quite properly imposed by the Province in Places to Grow Legislation), is to accommodate a fair share of the projected population growth that is forecast for the province by 2051. The population forecasts in Places to Grow have been quite accurate so far but may change in the future. A specific concern is that continuing the projected population growth requires an ever-increasing

annual number of ready to be self-sufficient young families immigrating to Canada. This could be a problem but is outside Guelph's control.

The second major goal that must be taken into account in land use planning is the, chosen by the city and not the province, of achieving a carbon neutral self-sufficient sustainable status for Guelph by 2051.

While there is no existing framework setting out the correct way to plan the City to achieve this goal the current indications are that the requirements include moving away from a private-car based economy and life style to a mixed-mode-transportation-based economy and lifestyle which features less overall travel, a larger share of self activated(active) transportation and public-vehicle transportation, and fossil-fuel-free energy sourced transportation (electric or hydrogen fueled vehicles and carbon neutral energy sources).

The basic direction for new development associated with this second goal requires giving priority to high density developments which provide convenient public transport and active transportation connections between dwelling place, location of employment, required service locations and leisure-time activities.

To achieve this second goal the City must create a framework that allocates approval of new developments according to a priority list based on the ability of the proposed development to contribute to the goal of achieving carbon-neutral sustainability for Guelph. The Clair Maltby secondary plan has been prepared without this prioritizing framework being in place and there is a strong possibility that when the needed framework of phasing development is prepared it will strongly favour intensification projects in the already built-up area over greenfield development and favour other greenfield areas over Clair Maltby.

Approval of the Clair Maltby Secondary Plan should be delayed until a planning framework for phasing development is approved.

ISSUE 2 LACK OF CONSIDERATION OF THE RELATIVE COST OF LAND PREPARATION COSTS AND SERVICING COSTS IN APPROVAL OF NEW DEVELOPMENTS

The cost of housing, which excludes most young Canadians from modest-income families from home ownership is a very urgent problem. Much of the problem is beyond the power of cities to remedy, However the choice of what land to choose for development has some influence on the costs of housing since land with higher costs for site preparation and provision of city services necessarily adds to the cost of housing built on it.

The Clair Maltby area is entirely taken up with hummocky terrain topography with almost half the area protected from development as natural heritage areas. The combination of hummocky terrain and multiple natural heritage areas results in dispersed development areas with large costs for reshaping the land for building lots and roads, higher costs for installation of servicing, and higher (energy) costs for maintaining wastewater servicing (pumping stations). The result is that development costs in Clair Maltby are higher, perhaps in many cases much higher, than land preparation and servicing costs for intensification projects and higher than land preparation and servicing costs for greenfield areas that are flatland not intersected by natural heritage areas.

The higher costs of development for Clair Maltby should be an important consideration in setting the priority frame work for development.

ISSUE 3 THE LOCATION AND FUNCTION OF ROAD A IN THE CLAIR MALYBY SECONDARY PLAN CONTRAVENES THE OFFICIAL PLAN AND THE CITY'S TRAFFIC CALMING POLICY

The City of Guelph Official Plan has an 'Environment First' focus. One of the cornerstone policies of this policy is the prohibition of any new roadway crossing any part of the Natural Heritage System. Exceptions to this prohibition are allowed but only if a road crossing of the NHS is shown to be "essential". The OP defines the meaning of essential as 'that (1) there is a demonstrated need and (2) it has been demonstrated that no other reasonable alternative exists'.

The city has failed to demonstrate that the crossings of the NHS by road A are essential. The City has stated that relieving through traffic on Gordon Street by providing an alternative through traffic route on Street A provides a better solution in terms of less widening needed for Gordon Street. This fails the essential test since the city concedes that additional traffic on Gordon Street can be accommodated (as is demonstrated by the high traffic volumes accommodated on Gordon Street north of Clair) it is just not preferred.

Furthermore, the option favoured by the City – allowing through traffic to use Street A – is not an allowable option under the City's Traffic Calming Policy or under the Canadian Guide to Traffic Calming. Both policies state that two lane collector roads in residential areas should not be used to convey through traffic.

The current proposal to extend collector Road A across the NHS crossings to allow it to function as a minor arterial road is contrary to the Environment First declaration of the Official Plan and contradicts the Traffic Calming policy. If the City finds that the Official Plan and the Traffic Calming Policy are too restrictive and do not represent good planning the appropriate action is to amend these policies NOT TO IGNORE THE STATED POLICIES.

ISSUE 4 THE COMPREHENSIVE ENVIRONMENTAL IMPACT STUDY FOR CLAIR MALTYBY HAS NOT BEEN COMPLETED SATISFACTORILY

A central component of the Clair Maltby CEIS is a study conducted using a computer model to determine the effect of urban development on the groundwater flow system that underlies the Clair Maltby site. The computer model used in the study was calibrated and run with a defective precipitation data file that grossly understated the precipitation for the study area. As a result, the model was incorrectly calibrated and does not give correct results in terms of the resulting impacts on the groundwater system that result from urban development. The model must be recalibrated using a correct precipitation data set and development scenario rerun before the CEIS can be considered completed.

ISSUE 5 THE STORMWATER SYSTEM FOR CLAIR-MALTBY WILL ADD EXTRA SALT TO AN ALREADY STRESSED GROUNDWATER SYSTEM

The city requires development proposals to include a Salt Management Plan and development proposals for Clair Maltby will meet this requirement. However, there is no mention in the draft secondary plan to require Salt Management Plans to have quantitative targets to be met for annual salt loadings that include reductions in road-salt use to meet sustainability goals.

There is increasing public attention on high chloride levels in streams in southern Ontario and the effects of these high chloride levels on aquatic ecosystems. There is also increasing concern in Cities like Guelph and the Waterloo Region that rely on groundwater as their drinking-water source about high chloride and sodium in drinking water.

As the graph below shows the rate of rise of chloride and sodium concentrations in Guelph's drinking water has increased in the last decade. If current trends persist the chloride concentration in Guelph's drinking water may exceed the Ontario Drinking Water Guideline of 250 mg/L before 2030 and the sodium concentration may exceed the ODWG specification of 200 mg/L not long after that.

I suggest there is an urgent need for Guelph as a groundwater-dependent city to develop an action plan to reduce salt loadings to its groundwater system and thus prevent the failure to meet ODWG specifications for chloride and sodium in its public water supply.

One of the most promising measures to reduce road salt application is the use of porous pavement. There are well documented studies that demonstrate that the requirement for de-icing treatment of porous pavement is much less than for impermeable pavement.

- The city should explore the possibility of requiring porous pavement for all roads and parking areas in Clair-Maltby as a salt-reducing option.
- The city should encourage the builder to limit salt-based water softening installation to hot water systems in all buildings.
- Replacement of on-surface parking with below or above ground within-building parking greatly reduces on-site use of road salt. And should be encouraged.

Trends in Sodium and Chloride in Guelph Drinking Water Since 1966

