

Dear Mayor, City Councillors and Staff,

Re: Shaping Guelph Official Plan (OPA 80) Council Decision Meeting

Thank you for the opportunity to comment on our Official Plan (OP) that is to guide the community's development for the next 30 years. This Plan has significant implications to the quality of life for existing residents. I have followed along the amendment review process over the past several years. I offer a succinct summary comment here related to implementation action of the OP. At this end point in the review process, I am hoping that Council will be able to provide direction to the planning staff 'for future consideration.'

My principal comment is associated with the Plan's implementation policies, specifically to the proposal to pre-zone designated higher density development sites that are deemed by the planning officials to be 'under-performing'. In the current era of implementing the provincial government's Toronto-centred plan for Guelph, there is a strong push to streamline the development review process for higher-density infill projects. The OP's Strategic Growth Areas, comprising higher density development sites, are intended to be zoned in the Comprehensive Zoning By-law (CZB) to allow the maximum development opportunities of the OP in terms of uses, density and height. In my opinion this is a mistake as infill proposals need to be carefully considered through a development review process that is publicly transparent and considered by all stakeholders (this includes neighbours to a particular development site). I'm making my comments here from a recent lived experience of planning for change in my neighbourhood that abuts a portion of the Gordon Street South Intensification Corridor.

My illustration below comes from the CZB that incorrectly illustrates the implementation of OP policy as it is associated with the Reid's development site at 1373-1389 Gordon. The 'blunt' proposal of the CZB is to zone the subject lands in accordance with the OP Land Use Schedule 2 lines without considering the need to zone Natural Heritage System (NHS) adjacency lands in a no-development protected zone. This is a mistake and illustrative of the permissive mindset that planning staff are instituting to bring new development lands on stream without full consideration of all planning applicable planning policy. The pre-zoning of land, as in this instance does not permit the consideration of fit, compatibility and appropriateness for neighbours, i.e., natural or human communities.

Excerpt of CZB that Illustrates Maximum Development Potential from the OP for 1373-1389 Gordon



Why is there no adjacent land zoning here on the 1373-1389 Gordon development site?– this CZB proposal maxes-out development without consideration of the adjacent NHS area

As council is aware, the OP is a policy document that is intended to lay out general directional aspects of growth and non-growth land use areas in the City. City planning staff are intending to take the general policies and applying the maximum development allowances available on underutilized lands. The imposition of these maximum development permissions from the OP is not appropriate. Neighbouring property owners will be excluded from the development review process, and errors/omissions may occur.

The proposal from the CZB concerning the Armtec lands – 41 George Street is another example of the proposed planning insensitivity of imposing a massive new development adjacent to NHS lands and into an existing lower density residential neighbourhood. The as-of-right maximum development permissions from the OP to the CZB (10 storey development at 150 units/ha) while accommodating new growth will also be a destabilizing force that undermines the long term desirability and functioning of the neighbourhood. In addition, the blunt imposition of the OP policy on to the land base does not provide adequate adjacency protections to the neighbouring NHS lands along the Speed River. Where are the provisions for riverfront trails and potential enhancements to the NHS system via the current CZB proposal? Matters of compatibility, appropriateness and impact on neighbouring NHS and lower density residential areas will not be considered with the staffs' pre-zoning permissive maximum development allowance approach.

In summary, I would encourage Council and staff to enact a precautionary principle for change to the land base of Guelph – not a propositioned so-called 'bold new' direction that is derived from the Torontocentric Places to Grow plan. The City faces a multitude of uncertainties impacting land use that you are all aware of – climate change impacts, fiscal uncertainties, available infrastructure (water supply), on-going changing provincial government pronouncements, outdated City administrative rules, e.g., urban forest tree canopy protection. The impacts of these various elements and others create much uncertainty in the planning system; it is not appropriate to lock-in massive development infill permissions via the current OP/CZB propositions (for the next 3 decades and beyond).

I would urge Council members and all of us to remember the moral from one of my favourite Aesop fables – The Tortoise and the Hare - slow and steady wins the race. This story lesson should be our guiding philosophic base as we venture forth in future community land use change for our city.

All the best in your deliberations and decision-making,

Dr. Paul Kraehling MCIP OPPI (Ret.)