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Guelph City Clerk,
1 Carden Street
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April 14, 2023

RE: Request for Deferral of Decision - Comments on City of Guelph Comprehensive Zoning By-law

The Guelph Wellington Development Association (GWDA) and the Guelph and District Home Builders' Association (GDHBA) have outstanding concerns regarding the Comprehensive Zoning By-law which were outlined in a letter on December 16, 2021, and that were not adequately addressed. We also have member businesses that have submitted comments that were not addressed. We are the builders and developers that must implement and build the new Zoning By-law and we have some serious concerns regarding the bylaw as presented. Not addressing these issues now will lead to a waste of resources downline through the Committee of Adjustment Meetings and Zoning By-law Amendments.

Please accept this letter as a request to defer a decision on the proposed new Comprehensive Zoning By-law (By-law 2023-20790).

The request is based on the following considerations:

- The City has just recently received approval from the Province of OPA #80. There are modifications in OPA #80 that should be considered and reflected in any new Zoning By-law to ensure that the By-law is appropriately implementing the approved Official Plan.
- The Province has just released a draft new Provincial Policy Statement (PPS). There are a number of changes proposed in the new PPS that may lead to changes in the Official Plan and/or changes to the new Comprehensive Zoning By-law.
- The new Zoning By-law significantly modifies aspects of zoning in the City and has implications on development and building within the City. It is acknowledged that the process has been underway for some time, however, the final draft of the By-law was only made available for review on March 29, 2023 and the staff report only made available on April 6, 2023. For such a significant document containing a substantial number of proposed changes to regulations that will impact the development industry, there was no consultation with the industry following the release of the draft new Zoning By-law. As key partners in the development of the City and providing housing within the City, we would appreciate the opportunity for further discussion.

We do not see the need to expedite the approval of a new Zoning By-law given the recent changes to the parent policies (Official Plan) and the potential for further change with the new PPS. There is risk in approving a new By-law that may not conform with the Official Plan or not be consistent with the new PPS direction, which will only lead to the need for further amendment to the Zoning By-law.

We would appreciate the opportunity to have additional time for a fulsome review of the final draft and work with City staff to understand the changes and complexities associated with the new By-law, new Official Plan and new PPS as they relate to the development and home building industry. Given the need to plan for and provide for a significant number of new homes in the City, we believe it is important that there is full understanding and clarity associated with the implementation of something as significant as this Comprehensive Zoning By-law. We need to work together to achieve the housing targets that have been established for the City of Guelph.

GWDA



We appreciate your consideration of this request to defer the decision and look forward to an opportunity for further discussion with staff with the objective of bringing the matter forward for council consideration in a timely manner.

Respectfully submitted,

Spencer Reid, GDHBA President

Carson Reid, GWDA President

c. Abby Watts, City of Guelph