

February 28, 2020

VIA EMAIL ONLY

Committee of the Whole
c/o City Clerk's Office
City of Guelph
1 Carden Street
Guelph, Ontario, N1H 3A1



Dear Chair and Members of the Committee,

Our File#: 19-1800

**RE: Clair-Maltby Secondary Plan – Open Space System Strategy & Staff Report IDE-2020-17
Submitted on Behalf of the Foundation for the Support of International Medical Training Inc.
2162 Gordon Street, Guelph**

The Foundation for the Support of International Medical Training Inc. ('the Foundation', c/o Mike and Assunta Marcolongo) are the owners of the Marcolongo Farm property, known municipally as 2162 Gordon Street, which is located within the Clair-Maltby Secondary Plan. Monteith Brown Planning Consultants Ltd. ('Monteith Brown') have been retained by the Foundation since May 2019 to represent our client's land use planning interests in the Clair-Maltby Secondary Plan process; Monteith Brown is one of Canada's foremost authorities in parks and recreation planning, and has substantial experience in speaking to this topic.

Over the past ten months, the Foundation and Monteith Brown have taken every opportunity to participate in the Secondary Plan and Open Space System Strategy planning process. Collectively, we have attended all community meetings held in September and November 2019, provided a number of written submissions directly to City Staff, and have met with City representatives on multiple occasions.

In short, our client is OPPOSED to the Community Park location (referred to as "Option #2") that is being recommended in the Open Space System Strategy and Staff Report No. IDE-2020-17. We request that City Council select an alternative Community Park location(s) for the reasons set forth in this letter, as well as any other reasons that our client may identify prior to this matter being considered.

Our client has two primary concerns with the recommendation in the Open Space System Strategy and the associated Staff Report as it relates to the Community Park:

1. **The City has provided insufficient justification and evidence for the selection of Option #2 as the preferred community park location.** Throughout this process, it has been our position that the site identified as "Option #1" in the staff report is the preferred option for a community park; and
2. Community Park Option #2, in the size and configuration recommended in the Staff Report, **will jeopardize the provision of hundreds of affordable housing units that have already been negotiated as part of an agreement with Options for Homes**, one of the largest and most established developers of affordable housing in Canada. This is especially true when taking into account the extensive Natural Heritage System (NHS) features and designated Cultural Heritage Landscape located on the Marcolongo Farm.

Opinion

Based on our review of the above-noted staff report and relevant planning documents, Monteith Brown and the Foundation have the following concerns regarding the recommended Community Park site (Option #2).

Proposed Size & Location Do NOT Reflect the Park's Function

It is our professional opinion that the size and location of the community park should be dictated by its function. Instead, staff have repeatedly stated throughout the public engagement process that the function of the community park will be determined **after** the location had been chosen, despite requesting feedback on the function of the proposed Community Park through the public consultation process. The fact that the public was not privy to City analyses relating to the park's function nor was the public asked to prioritize locational criteria and sites with such knowledge **leads to a flawed approach to site selection** when compared to best practices employed in other communities. The Staff Report provides the first publicly available description of the park's potential function, noting that it will contain active and passive facilities.

We question the basis for how the City has determined that Option #2 is the best fit for a park containing an "intermediate recreational amenity" and multiple sports fields, when documented input from the City's Community Park Open Space Strategy consultations places a strong value on the preservation of natural heritage and environmental features above intensive sports infrastructure in this area. Throughout the community engagement process, members of the public raised concerns about the potential impacts of landscaping and the site alterations required to accommodate active recreation facilities. Further, the park composition remains unclear as **the Staff Report does not state how many sports fields or other recreational infrastructure, including the undefined "intermediate recreational amenity" are required to justify a 10-hectare park parcel in Clair-Maltby.**

Inconsistent & Ambiguous Analysis of Walkability

The Staff Report prioritizes Option #2 over Option #1 based on its centralized location and an evaluation of the walkability of each location. In fact, Option #1 is more centralized as the Staff Report, consistent with the City's Official Plan, states that the Community Park designation serves multiple neighbourhoods and transcends the Secondary Plan boundary. This suggests that Option #1 is more centralized, as its service catchment extends into established neighbourhoods to the north. **The City's calculations show that Option #1 reaches 8,900 people within 800 metres (the highest catchment among all three sites)** while Option #3 reaches 4,400 people within 400 metres; both of these Options are greater than shown in Option #2 (4,150 people within 400 metres and 8,700 people within 800 metres). On this basis, it is our opinion that the City's evaluation was flawed.

It is also our opinion that if the City wishes to maximize walkability within the Secondary Plan area, then it should revisit its decision to choose a single large park rather than two smaller Community Park parcels distributed throughout Clair-Maltby as was presented to the public during the Open Space Strategy consultation process.

A Need to Consider Potential Conflicts & Overstated Impacts of Road Access

Option #2 is embedded within a large, presumably future residential area, and **could create conflicts with nearby homes due to traffic, noise, sports field lighting, and other impacts** resulting from the park's ultimate function. Option #1, flanked on three sides by natural heritage lands and a proposed built-up area to the west, would buffer such impacts from adjacent land uses.

The Staff Report immediately discounts Option #1 on the basis that it does not allow for adequate dispersal of traffic after special events. Given the lack of rationale supporting the need for an event space or other specific recreational infrastructure, we see similar traffic impacts of Option #1 and Option #2 as both provide two distinctive points of arterial access by way of their respective collectors, thereby enabling an appropriate flow of traffic. In our opinion, Option #1 should not be eliminated from consideration until the City determines whether the Community Park would generate unacceptable traffic impacts based on its yet-to-be-defined function.

NO Consideration of the Foundation's Proposal to Bequeath Land to the City

Following a meeting with City Staff on February 3, 2020 and in accordance with an agreement of timing of next steps, Monteith Brown submitted correspondence on behalf of the Foundation's Board of Directors prior to the release of the Open Space Strategy and Staff Report. The meeting and subsequent communication reinforces the commitment of the Foundation to work collaboratively with the City to maximize the public good and **a willingness to bequeath a portion of land within the designated**

Cultural Heritage Landscape to the City of Guelph. This would result in publicly-owned lands in the location proposed through Option #2 without compromising the affordable housing project, and would bolster the amount of open space in the Secondary Plan area over and above parkland dedications, without the City having to purchase additional lands.

City staff have provided a response to our client that relies upon the findings of the Open Space Strategy and Staff Report. However, the Foundation's proposal is not discussed in the Staff Report.

Lack of Certainty Regarding Municipal Parkland Acquisition re: Bill 108

The recent passage of Bill 108 has led to lack of certainty regarding municipal parkland dedication requirements and the ability of the City to acquire large amounts of parkland for the proposed 10-hectare Community Park. At this time, the regulations regarding Community Benefits Charges are still forthcoming, and **it is unclear how the City will fund the acquisition of several hectares of parkland from a single landowner**, above and beyond standard parkland dedication requirements.

Conclusion

We are concerned that Council may endorse a community park location without knowing whether it will suitably meet the recreation needs of the City and the Clair-Maltby area, while at the same time jeopardizing a significant planned affordable housing project.

Based on our review and analysis of the Staff Report and other materials relating to the Clair-Maltby Secondary Plan, it is our professional opinion that **Option #1 is the most suitable site for a Community Park** oriented to passive and active recreation uses, as it conforms to the Official Plan's Community Park criteria for size, location, and function. Our client has also identified an opportunity to connect Option #1 and the CHL on the Marcolongo Farm through our client's proposed bequeathal of parkland from within the CHL.

On this basis, we respectfully request that the Committee of the Whole does NOT endorse Community Park Option #2 as the recommended location in Clair-Maltby, and instead endorse Option #1, and direct staff to more comprehensively review the merits of our client's proposal to bequeath lands within CHL to the City of Guelph for parkland.

We would also request to be notified of any future meetings or decisions regarding the Clair-Maltby Secondary Plan and the Open Space System Strategy. Should you have any questions regarding this matter or require any additional information, please do not hesitate to contact us.

Respectfully submitted,

MONTEITH BROWN PLANNING CONSULTANTS



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