



BOUSFIELDS INC.

Project No. 2359

Thursday, November 30, 2023

Via E-mail to: clerks@guelph.ca

City Clerk's Office
City of Guelph
1 Carden Street
Guelph, ON N1H3A1

Dear Mayor Guthrie and Members of Council,

Re: *Special City Council Meeting Agenda on December 5, 2023*
Item 2.1 – Official Plan Amendment 80 – Minister's Reversal of Provincial Modifications

We are the planning consultants for *Industrial Equities Guelph Corporation* (the "Owner"), owner of the lands municipally known as 384 Crawley Road in the City of Guelph (the "subject site"). We are writing to request that Council maintain the site-specific policy 9.13.3.13 (Item 117) and mapping changes (Items 118-126) of the Minister's approval of Official Plan Amendment 80 (the "OPA 80"), which apply to the subject site (being Modification 15 of the Minister's decision regarding OPA 80).

In our opinion, maintaining Modification 15 to OPA 80 for the subject site is reasonable and appropriate as it will remove obstacles and allow for the development of an advanced industrial campus, which is aligned with the Official Plan, will achieve numerous policy objectives, and will result in significant economic benefits for the City.

Background

The subject site and the remainder of the Southgate Business Park have been planned for employment uses since at least 2001 in the City's Official Plan. It has also been identified as a *Provincially Significant Employment Zone* (the "PSEZ") when these zones were first designated in 2019. In this regard, the PSEZ is an important part of the provincial land use structure and are areas that are planned for long-term job creation and economic development that contain a significant number of jobs. Although the subject site has remained vacant, the natural heritage system elements of the subject site have been extensively studied since 2010, which studies include an Environmental Implementation Report published on the City's Business Park website.

In this regard, the Owner has been collaborating with the City in order to establish the natural heritage system limits as required to advance development of the subject site for its planned employment uses.

In early 2022, the Owner engaged a consulting team to advance development of the subject site for a Sustainability Campus to accommodate a state-of-the-art cold storage and manufacturing facility to be owned and operated by NewCold. Initiation of the project included multiple meetings with City Staff and a pre-consultation meeting in November 2022. In this regard, the proposed development conforms to and implements the land use permissions in the Guelph Official Plan and Zoning By-law, since it would add a significant amount of employment development and new jobs.

A minor variance application was filed and approved by the Committee of Adjustment on May 1, 2023.

A pre-submission Site Plan Review Committee was held on May 21, 2023, prior to and in preparation for a site plan application (the “SPA”) submission.

On July 28, 2023, a formal SPA was filed for the subject site in order to facilitate development of the NewCold Guelph Sustainability Campus.

Benefits of Maintaining the Minister’s Modifications for the Subject Site

Modification 15 to OPA 80 provided the following new policies and mapping changes for the subject site:

- Site Specific Policy 9.13.3.13, which allows for:
 - A maximum gross floor area of 160,000 square metres and a maximum building height of 46 metres.
 - The alignment of a future planned public road to be determined by the City in consultation with the Owner and the conveyance of a future public road may be secure through a site plan or consent agreement.
- Modifications to Schedules 2, 3, 4-4e, and 6 in order to further delineate the natural heritage system.

In our opinion, these modifications appropriately remove process obstacles related to the development of the subject site. More specifically, these policy modifications:

- Allow for development of the lands for a desirable employment use, being the planned NewCold Guelph Sustainability Campus, including the required gross floor area and building height.

- Allow for the City and Owner to confirm an appropriate alignment for the future public road and to implement and deliver it through the already filed SPA.
- Allow for the SPA and required (and filed) Environmental Impact Study (the “EIS”) to delineate and protect the natural heritage system.

The City is the approval authority for the SPA, and it can ensure orderly development of the subject site, including any additional requirements that would be generated by not having the site-specific policies that were added via Modification 15 to OPA 80.

Consequences of Not Maintaining the Minister’s Modifications

In our opinion, if Modification 15 is reversed by Bill 150 it will significantly delay redevelopment of the lands by necessitating an Official Plan Amendment and potentially other approvals for this beneficial employment use. The SPA submission currently before the City is comprehensive and includes a full list of studies and reports including an EIS, Functional Servicing Report, Transportation Impact Study, Environmental Assessment, Archaeological Assessment, Noise Impact Study, etc.

The need for any such additional approvals would require pre-consultation and the potential preparation and submission of new supporting documentation (in addition to the already significant and comprehensive supporting documentation filed with the SPA). As a result, we anticipate that any such additional approvals will unnecessarily delay processing of the submitted SPA by at least a year.

In our opinion, this delay would be a process delay and not add value to the orderly development of the subject site. In this regard, it is our opinion that:

- The maximum gross floor area has been established through the SPA.
- The maximum building height was approved through the minor variance application.
- The desired public road will be implemented and delivered through the SPA, consistent with how other public roads have been delivered in the City of Guelph.
- The natural heritage system limits will be determined through the EIS and implemented via the SPA and all required compensation and/or enhancement areas will be secured through the SPA process.

For the reasons outlined herein, it is our opinion that maintaining Modification 15 for the subject site would avoid the need for additional applications that would not add any value to the on-going approvals process and would instead only serve to delay delivery of a very desirable employment use, the NewCold Sustainability Campus, which use is consistent with existing Provincial and Official Plan policies.

Benefits of the Proposed Development

There are numerous benefits associated with the proposed NewCold Sustainability Campus development on the subject site, including:

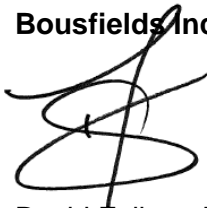
- The development vacant and underutilized employment lands in a *Provincially Significant Employment Zone*, which is a provincial area that is planned for long-term job creation and economic development that contain a significant number of jobs. The construction of 160,000 square metres of new high-technology employment buildings.
- The creation of approximately 570 new full-time jobs for the City, plus additional construction jobs.
- A significant increase in the property taxes for the subject site, estimated at approximately \$12 million annually.
- Economic benefits for the surrounding business park and regional agri-food industry.
- Providing a much needed innovative cold storage facility to the City and region's agri-food sector.

Concluding Thoughts

For the reasons outlined herein, we respectfully request that City Council maintain Modification 15 to OPA 80 for the subject site.

Respectfully Submitted,

Bousfields Inc.



David Falletta MCIP, RPP

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