

Stephen O'Brien, City Clerk

April 9, 2024

Dear Mayor and Councillors:

Re: Public Planning Meeting Respecting Gentle Density: Four Units on a Lot – File OZS24-002

I am generally in favour of the 'gentle density' housing proposition that is being discussed today. This is not a new thing as intensification within the lower density residential areas of Guelph have been underway for quite some time¹. The City has permitted various types of housing intensification in the form of lodging houses and secondary suites from the early 1990s (other forms too such as group homes, halfway houses).

For the purposes of my commentary today, I'm concerned about the bigger picture notions of unanticipated consequences, and also the cumulative impact of suggested changes. As you are well aware, there has been a flurry of changes to the housing planning policy and regulatory framework by the Province, and it is difficult now to intelligently comment on constantly changing rules and regulations at the municipal level. Clarity of thought is often not present when politicians cry 'crisis'. Substantial sections of the City's recent comprehensive Zoning By-law (ZB) are before the OLT and what final regulations come out of that process are uncertain.

I'm concerned with blanket permissions being provided for the proposed ZB amendment on lots across the City. Unintended consequences, as a possibility, can be the ghettoization of certain streets or neighbourhoods by investors trying to 'maximize a buck' by cramming 4 units per lot in an area, e.g. a further intensified Reid Court situation.

For my immediate neighbourhood (I live in the south end in a newer area comprising narrow streets with small lot singles and on-street townhouses), I am concerned by unintended consequences and cumulative impacts of a hardened surface neighbourhood environment, i.e., a 'concrete jungle' cityscape. The ZB amendment provisions permit more of a yard to be hard surfaced with rear yard Additional Dwelling Units and their associated non-porous surfaces. I note that the planning staff propose to maintain the 35% landscaped open space regulation for plants which I support, BUT looking into the definition further I see that driveway aprons, sidewalks and patios, etc. can be a component of that 'landscaped area'. I have witnessed in my neighbourhood the hard-surfacing of front yards beyond driveways per se to make room for 'overnight stopping areas for vehicles' on non-driveways. On the 80 small lot singles in my neighbourhood (zoned RL-1 and RL-2), oversized driveways now comprise over 60% of all front yards; in conjunction with rear yard patios, decks, gazabos, sheds, etc. I doubt very few of the lots meet the City's minimum required 35% lot coverage for landscaping regulation.

In my area (and most likely in many other parts of the City) I am concerned the new by-law permissions could exacerbate the current overall impervious conditions on small lots with resultant harmful impacts to the environment, primarily in storm water management (more flooding, harmful polluted runoff). In addition, there could be very fewer spots to plant trees/other vegetation with front yards hardscaped and new housing units 'planted' in rear yards. The urban concrete jungle is quickly being realized in my area with the street public realm being

¹ Hemson and Associates, 1992. City of Guelph Housing Intensification Study

filled with asphalt on narrow roadways, cars and hard surfacing in most lot front yards, and houses built close to the street.

I believe it is important that at least a minimum 35% of a small lot area be comprised of 'only' living plant material. The provision of green space is important for the protection of natural communities (give them at least 1/3rd of the available land area) and providing visual access to green spaces for human health and well-being reasons, i.e., proximity of greenery to one's home is essential as documented in the scientific literature.^{2 3}

We need to find 'balance' in protecting the needs of both natural and human communities.

Thank you,

Dr. Paul Kraehling MCIP RPP (Ret.), OPPI (Lifetime)

² Maas J., et al., 2006. Green space, Urbanity and Health: How Strong is the Relation?

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https://scholar.google.com/scholar_lookup?title=Green%20space%2C%20urbanity%2C%20and%20health%3A%20How%20strong%20is%20the%20relation&publication_year=2006&author=J.%20Maas&author=R.A.%20Verheij&author=P.P.%20Groenewegen&author=S.%20de%20Vries&author=P.%20Spreuwenberg

³ Ulrich and Parsons, 2020. Influences of Experiences with Plants on Well-being and Health.

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