



May 6, 2020

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Guelph City Hall
1 Carden Street
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Attention: Mayor Guthrie and Members of
Council

Dear Sirs/Madams:

Re: IDE-2020-17 Clair-Maltby Secondary Plan: Open Space System Strategy

Thomasfield Homes Limited is a Guelph-based family run business. Tom Krizsan founded Thomasfield Homes in 1978 and he is pleased that his children have joined the company and are contributing to its ongoing success. Mr. Krizsan is also proud to have long time (in some cases 25 years or more) established relationships with local trades and suppliers. Mr. Krizsan has developed and owned the Springfield Golf Course, (Audubon Certified) located within the Clair-Maltby Secondary Plan area, since 1988.

Thomasfield Homes has been closely following the Clair-Maltby Secondary Plan process and respectfully requests that when Council considers Report IDE-2020-17, that the following motions be approved;

1. **That the Clair-Maltby Secondary Plan Policy Directions: Open Space System Strategy dated March 2, 2020 included as Attachment 2 to report IDE-2020- 17, be referred to staff and that a meeting with the landowners be held by staff to attempt to reach a consensus with respect to a Community Park location that meets the City's criteria to be brought back to Council for consideration.**
2. **AND THAT the final parkland recommendations may be impacted and revised based on the Financial Impact Assessment to be completed for the Clair-Maltby Secondary Plan in its entirety.**

The reasons for this request are outlined within this letter.

Has the need for a second Community Park been established?

Thomasfield Homes is in agreement with other landowners questioning the need for a second Community Park within the Clair-Maltby area given that Larry Pearson Park is located abutting the limit of the Clair-Maltby Secondary Plan boundary. Since Larry Pearson Community Park is the future location of the South End Recreation Centre, it is our belief that putting the City's resources toward achieving the South End Recreation Centre is a better option for the City than creating a second Community Park and its associated

municipal financial obligation within the Clair-Maltby Secondary Plan area. We continue to question the need for this Community Park within the Clair-Maltby Secondary Plan area. There has been no analysis provided by the City justifying the need for a second Community Park in this area.

Should the Existing Larry Pearson Community Park be expanded?

The City's current Recreation, Parks & Culture Strategic Master Plan 2009 appears to identify the current Larry Pearson Community Park as the only required Community Park for the south end of Guelph. This report recommends purchasing additional land to add to this existing Community Park to accommodate all of the recommended components of the Community Park.

Monteith Brown prepared the City of Guelph – Recreation, Parks & Culture Strategic Master Plan/South End Centre Component Study, July 2009. Below are excerpts from this report;

“12. South End Centre (Component Study)

*Page 119 **OVERVIEW***

*For some years, the City of Guelph has identified the need for a community facility to serve the growing South end. The planning for this facility began in earnest with the acquisition of land for a community park on Clair Road West earlier this decade. The purpose of this Component Study is to identify the types of spaces and potential activities that would be a good fit for the South End Centre, in keeping with the City-wide and community-specific assessment of indoor recreation infrastructure needs that was undertaken in the Recreation, Parks and Culture Strategic Master Plan. Input regarding the **South End Centre** was solicited through several avenues, including the household survey, stakeholder group survey, and several workshops and open houses. “The City’s long-term capital forecast has identified approximately \$34.7 million in funding for site preparation and construction of this facility; **90% of this funding is expected to be generated from Development Charges**. Although originally planned to begin construction in 2013, **with facility opening to occur in 2015**, the availability of funding may affect timing. While the original timeframe remains a reasonable target from a ‘needs’ perspective, **funding realities will need to be evaluated during future planning phases for this facility.***

***The City’s population is forecasted to grow by over 54,000 people by 2031 and a significant portion of this growth is expected to be accommodated in the City’s south end.** South Guelph also has more families with children (per capita) when compared to East and West Guelph, suggesting a greater than average demand for introductory community-level recreational opportunities.”*

*Page 124 **Purchase additional land to the east to provide sufficient space to build a South End Centre consisting of all of the recommended components (including the twin pad arena).** This option has the potential to cause project delays as negotiation, planning approvals and/or additional site work may be required.”*



Page 124 **SITE ASSESSMENT**

*The proposed site for the South End Centre is within the **16.2 hectare (40 acre) South End Community Park on Clair Road West at Poppy Drive.***

Vehicular access to the site from Clair Road West is good and it is in close proximity to the Hanlon Expressway and existing neighbourhoods to the north and northwest.”

The City’s current Recreation, Parks & Culture Strategic Master Plan 2009 recommends purchasing land to be added to the existing Larry Pearson Park. Staff should pursue this option rather than adding a second Community Park to this area.

Is 10 hectares too large for a Community Park?

Thomasfield Homes is also in agreement with other landowners in Clair-Maltby that if a second Community Park is located within Clair-Maltby, then size of the park should be re-evaluated based on the best practices of other municipalities such as Milton, Hamilton and Ottawa where smaller Community Parks are the standard. (as noted on page 9 of the Staff report).

With respect to the size of the Community Park, on page 8 of the staff report it is confirmed that,

*“An example of this vision for a community park is Norm Jary Park (22 Shelldale Crescent) which has both active and passive uses including three sport fields, a natural area and a variety of other recreational amenities. The park is **9 ha in size** and is co-located beside a community hub and an elementary school. The City currently has 34 community-level parks and the **average size of our community parks is less than the minimum 10 ha** outlined in the OP. The existing community parks are serving the intended function and through the **early stages of the Park and Recreation Master Plan process there has been no indication that community parks need to be bigger.** Through the Parks and Recreation Master Plan benchmark analysis it is noted that **many other comparator municipalities have community parks policies with a standard size that is smaller than 10 ha in size.** For example, the City of Milton’s community park minimum size is **6.0 ha**, Hamilton is **7.0 ha** and Ottawa is the smallest at **3.6-6.0 ha.**”*

Monteith Brown prepared the Township of Centre Wellington Parks Recreation & Culture Master Plan which speaks to criteria related to Community Parks. Excerpts from this report are below;

Page 19 **“Community Park**

- *may be between **2 to 8 hectares is size but not normally be less than 4 hectares** in size to facilitate efficient complexes of at least 2 athletic facilities.*
- *Community Parks are intended to serve a greater community or series of neighbourhoods.*



- *To be situated with appropriate separation to other Community Parks.*
- *May contain illuminated major sports fields, field houses, indoor recreation facilities and parking.*
- *To have frontage on an arterial road with a minimum of 100 metres of continuous frontage.*
- *Where possible to be integrated with Stormwater Management Ponds.*
- *Where possible will be integrated with natural features and will assist in the conservation and protection of those features through the design of park program and landscape.*
- *Where possible include clearly defined entrances to the local trail system integrating trail head locations into the design of the park.”*

Clearly the City’s proposed Community Park of 10 hectares is larger than is needed.

What are the financial impacts of Bill 108 on parkland?

Thomasfield Homes is also in agreement with both the staff report and many of the delegations at the Committee of the Whole March 2, 2020 meeting who expressed concern with potential impacts of Bill 108 and the ability of municipalities to finance the purchase of parkland going forward. Thomasfield Homes supports the second motion approved by the Committee of the Whole which allows Guelph to be responsive to this issue once the impact has been evaluated.

Since the initiation of the Clair-Maltby Secondary Plan process, the Province has approved Bill 108 which has created financial uncertainty for municipalities as noted on page 16 of the staff report,

“Funding for the purchase of the lands may come from the new community benefit charge (CBC) or other municipal sources. The province has passed legislation that replaces certain development charges, parkland dedication and density bonusing revenues with a new CBC. These are significant revenue streams for the City which are used to the fund growth-related park acquisition and development, recreation facilities and equipment, parking and library facilities in the long-term capital plan.

There is a great degree of uncertainty around the future of these revenue streams due to the provincial development and expected consultation process of the CBC regulations. *There may be fiscal impacts from these changes that cause an increase in property taxes and/or a reconsideration of the capital plan, including reducing the size and scope of projects or extending the time horizon of when the project would begin. The fiscal impacts may also result in revisiting service levels as defined in the Official Plan and Master Planning documents.”*

What are appropriate locational criteria for a Community Park?

Thomasfield Homes has been following the Clair-Maltby Secondary Plan process and participated where opportunities have been provided by the City. Twice City staff have recommended that Option 2 be the preferred location for a Community Park. Staff accommodated Council’s request to undertake additional community engagement and upon



reviewing the findings concluded once again that Option 2 remain the preferred location for the Community Park. It is fair to state that the owners of the property to the south of the Springfield Golf Course, the developer who has a portion of their property under contract, as well as their supporters were in attendance and participated fully in the community engagement process related to the Community Park.

Council will recall that earlier versions of the Clair-Maltby Secondary Plan included a north south road connecting the Springfield Golf Course property to the south. The owner to the south lobbied to have this north south road connection removed from the Clair-Maltby Secondary Plan which leaves the Springfield Golf Course property isolated from other surrounding properties with its only road connection provided by Gordon Street. For this reason, Option 1 should not have even been on the list for consideration as a potential Community Park location. The isolated location of this potential Community Park should have disqualified it from being considered.

One of the principles discussed through the secondary plan process has been the benefit of locating Neighbourhood Parks where they can provide recreational greenspace along the high density Gordon Street intensification and transit corridor. The appropriate parkland for the Springfield Golf course property is a Neighbourhood Park located in proximity to the high density residential Gordon Street corridor, not an oversized and isolated Community Park with poor traffic access.

Page 8 of the staff report identifies the planned future programming of the Community park as *“a range of active facilities including several sports fields, an intermediate recreational amenity or a large event space. In addition to an active intermediate facility, the site will also accommodate passive uses and parking.”* This level of programming will result in unacceptable impacts of car travel on local residential streets if the Community Park is located on the isolated Springfield property. In stark contrast the Option 2 location recommended by City staff for the Community Park has excellent road access to Gordon Street, Maltby Road and Victoria Road.

Option 2 for the Community Park location has exceptional visual exposure to the Natural Heritage System. It also has the distinct advantage of having excellent traffic access to Gordon Street, Maltby Road and Victoria Road.

The Option 1 location does not meet all of the considerations outlined in section 7.3.2.7 of the Official Plan, whereas, the Option 2 location meets all of the criteria outlined in section 7.3.2.7 for a Community Park within the Official Plan.

Excerpts from the Guelph Official Plan (March 2018 Consolidation) are outlined below;

“Community Parks

Community Parks are designed primarily to provide specialized recreation facilities for use by a wide segment of the population and serve more than one neighbourhood.



7.3.2.7 The following criteria will be considered in the development of Community Parks:

- i) **that the site has direct access to an arterial or collector road and is accessible by public transit;**
- ii) **that the site contains sufficient parking to meet anticipated demand;**
- iii) *that the site contains sufficient table land to accommodate the needs of the active recreation facilities proposed for development;*
- iv) *that the site can be linked, where feasible, to the overall trail network; and*
- v) *that the site consists of between 10-20 hectares in size, depending upon the nature of the facilities proposed. **However, a very specialized facility may be developed on a smaller site.***

Option 1 does not have direct access to an arterial or an east west collector road. Public transit is very unlikely to be provided within the Springfield Golf Course property. Community Parks require parking because they serve more than one neighbourhood and people drive to them for tournaments etc. Option 1 is not a reasonable location for a Community Park.

Should there be a short pause to allow for a fair and equitable Community Park solution?

This is an important decision that will remain as a legacy with the City and it should not end up in an LPAT appeal that will need to be defended by Council with a decision that is contrary to the staff recommendation. A short pause to allow the landowners to meet with City staff could result in a sustainable decision for the future Community Park.

It is being recommended that report IDE-2020- 17, be referred back to staff and that a meeting with the landowners be held to reach a consensus with respect to a Community Plan location that meets the City's criteria to be brought back to Council for consideration.

The second recommendation is based on the staff report and is being proposed to clarify the intent of the Council resolution. It may be that the implementation of the Community Park will not be financially feasible based on the provisions of Bill 108 and the future Community Benefit Charge. The Committee of the Whole endorsed this second recommendation on March 2, 2020.

1. **That the Clair-Maltby Secondary Plan Policy Directions: Open Space System Strategy dated March 2, 2020 included as Attachment 2 to report IDE-2020- 17, be referred to staff and that a meeting with the landowners be held by staff to attempt to reach a consensus with respect to a Community Park location that meets the City's criteria to be brought back to Council for consideration.**
2. **AND THAT the final parkland recommendations may be impacted and revised based on the Financial Impact Assessment to be completed for the Clair-Maltby Secondary Plan in its entirety.**



Thank you for the opportunity to provide these comments.

We look forward to hearing when this matter will be back before Council for consideration and please take this as a formal request for written notification of any future Council or Committee meetings on the above noted matters.

Yours truly,

MILLER THOMSON LLP

Per:



Trenton D. Johnson
Partner
TDJ/aa

c: Stacey Laughlin, Senior Policy Planner

