

August 28, 2025.

**Re: 343 Waterloo Avenue, File number OZS25-009**

Dear Mayor Guthrie and Members of Guelph City Council:

I recently watched video of the August 22<sup>nd</sup> Council Meeting in which the Mayor and owners of 343 Waterloo Avenue presented Council with their plans for redevelopment of the property. I am troubled by several issues that arise from that meeting which I would like to address here.

Most important is the exclusion of input from the Planning Department prior to the vote by Council. Indeed, all the points that I make below flow from this. Apart from Councillor Allt, Council members supported the motion to approve, notwithstanding the lack of input from the Planning Department. Several Councillors voiced concerns about strong mayor powers, however, their objections were apparently insufficiently deep-seated to warrant voting against the motion. The Mayor suggested that the public had not raised serious concerns: of the 4 or 5 letters he received, only one voiced opposition, which the Mayor indicated he had mostly responded to, while the direct neighbour was supportive. What was not made clear was that the "direct neighbour" was the garage owner next door, not the residential neighbour on Beechwood Avenue whose property abuts the side yard of the proposed redevelopment. The Beechwood neighbour, who had planned to raise concerns at the meeting, could not do so because of the failure to align the meeting time with that provided in the public mailing.

A cursory glance at the Concept Plan (attached), which incidentally was not the version mailed to neighbours, reveals why the Planning Department should have been heard prior to the vote. Although the rebuild of 343 Waterloo may align with the City's environmental and social goals, it does not conform in large measure with the City's Official Plan. While it is understood that strong mayor powers mean that Official Plans may be overridden, it doesn't mean they should be. One expert describes the uptake of strong mayor powers in Ontario as "fairly underwhelming". There are 46 strong mayors but as of June this year, only a few have made use of their powers (CBC, June 1, 2025). That is not the case in Guelph where that power has been used "a number of times" (City News, July 22, 2024). In the current case, the redevelopment deviates from the Official Plan in terms of height (4 storeys vs. 3), density (400m<sup>2</sup> vs 1276 m<sup>2</sup>), and also from the Zoning By-law in terms of setbacks (wide deviations in rear yard and buffer zones) and parking (8 vs. 20). None of these deviations were fully explored in the August Council meeting. Councillors Billing and Busuttill both inquired about parking restrictions but did not pursue them.

It is worth exploring the implications of deviations from the Official Plan and Zoning By-laws in more detail. As regards parking, the owners of the property stated that some of the tenants would not have a parking space provided to them in their rental agreements. Who might those renters be? Those paying affordable rents, perhaps? It was stated by the owners of 343, who would themselves use the ground floor for their business, that their spaces could be used by others at night when they were not there. In addition, they mentioned "a family system" of parking in which people could park behind each other. But how would this work in practice? Assuming the business owners use at

least two or three of the parking spots for themselves (although under the Zoning By-law, 9 would be designated to the business to allow sufficient space for staff and clients), this would leave perhaps 5 or fewer spots for tenants in the 9 apartments. Where would the others park? Presumably on side streets. Moreover, some tenants would almost certainly have more than one car. Would permits be issued to allow for parking on side streets? If so, what happens in winter when overnight street parking is not permitted to allow for the plowing of the steep sideroads? It is worth comparing this development with the apartments on the other side of Beechwood Avenue located in the former Guelph bus barns and adjoining building (Graystone Residences at [REDACTED] Waterloo Avenue). These apartments were provided with appropriate parking spots through the planning process and residents do not spill onto the neighbouring streets. Hearn, one of the side streets, is narrow, allowing only one lane of through-traffic to accommodate on-street parking, which is permitted on the east side, except overnight from December to April between 2 am and 6 am. However, the incline of the hill, combined with limited traffic pass-through, encourages cars to gun up and down the street, making it difficult, and dangerous, to edge out of one's driveway between parked cars and trucks into the single line of fast-moving traffic. Consequently, most residents, who are only too aware of such problems, park in their driveways - even if it means regularly switching the position of cars (so-called "family parking") - out of consideration for their neighbours. Increased on-street parking will intensify the problems associated with traffic flow on a sloped, narrow street. Parking on Beechwood is already at maximum at key times of the day because of the mosque and spillover cars from the new townhouses on the west side by Howitt Park. How will the deficit of parking spaces (8 vs. 20) at 343 Waterloo navigate this already stretched parking environment?

Increased height and reduced setbacks also raise substantial privacy concerns for local residents. Moreover, we learned in the presentation, there will be a balcony on the side facing Beechwood Avenue, allowing the residents to gather in a communal space. Since technical details of the balcony were not provided in the presentation, it is impossible to tell whether it will meet the specific setback requirements for an apartment balcony. But it necessarily presents privacy concerns for residential properties abutting such developments, with the potential to set precedents along arterial roads. In this specific case, since the frontage opens onto Beechwood (despite its Waterloo address), it is the rear setbacks abutting the garage that deviate most noticeably from Zoning By-laws. With only 1.2 m from the property line, rather than the 6.2 m calculated for this property, are windows to be permitted given the short distance from the property line? Again, in the absence of input from the Planning Department, none of these details have been revealed.

Finally, I would like to point out that most of the details presented here were not available to residents through the mailing. It was only through watching the video of the presentation given by the owners of 343 Waterloo, and through additional information sought out online as a consequence of the presentation, that the full scope of this development has become evident to the public. And this opportunity to view the presentation after the fact, happened only by chance because of "administrative error". Had the process followed a normal review pattern, the Planning Department would almost certainly have brought the above-mentioned issues before Council for ample discussion before members were asked to vote on the matter. Deviations from the Official Plan and Zoning Bylaws require thoughtful deliberation. But in the rush to get this approved,

neither the public, nor I suspect Council, have had the opportunity to fully review the proposed development. And while the Mayor may find the delay of the normal Planning process to be unacceptable in this instance due to the importance of the “community benefit” that this development purportedly delivers, the Official Plan and Zoning By-laws exist for a reason. As Councillor Allt pointed out, all projects brought before Council have community benefit. This one is not out of the ordinary. After all, it delivers just two affordable rental units out of nine, along with a build that gives some consideration to the environment. In the latter regard, however, it should be noted that in spite of environmental benefits, there are also negative environmental externalities around parking that fall on the City, e.g. difficulties of snow plowing, drainage problems from debris around parked cars, etc. owing to the steep topography of the side streets, which raise public costs that are not insignificant. Notwithstanding these concerns, it is being rushed through Council in a way that *is* out of the ordinary and this abnormal process has the potential to set precedents that will have long term implications for development in the City of Guelph. Thus, the exemptions being sought here need to be thoughtfully examined. With this precedent, the neighbouring garage owner on Waterloo Avenue, who we learned is very supportive of the redevelopment at 343 Waterloo, will not hesitate to exploit these same exemptions in the future. This would mean that the negative impacts raised here will likely be duplicated should this development go forward. Such ad hoc decisions are not the stuff of rational planning that the City of Guelph prides itself on.

I sincerely hope that the Mayor and Council will reconsider their positions and vote against approving this development before the Planning Department has had the opportunity to weigh in.

Respectfully,

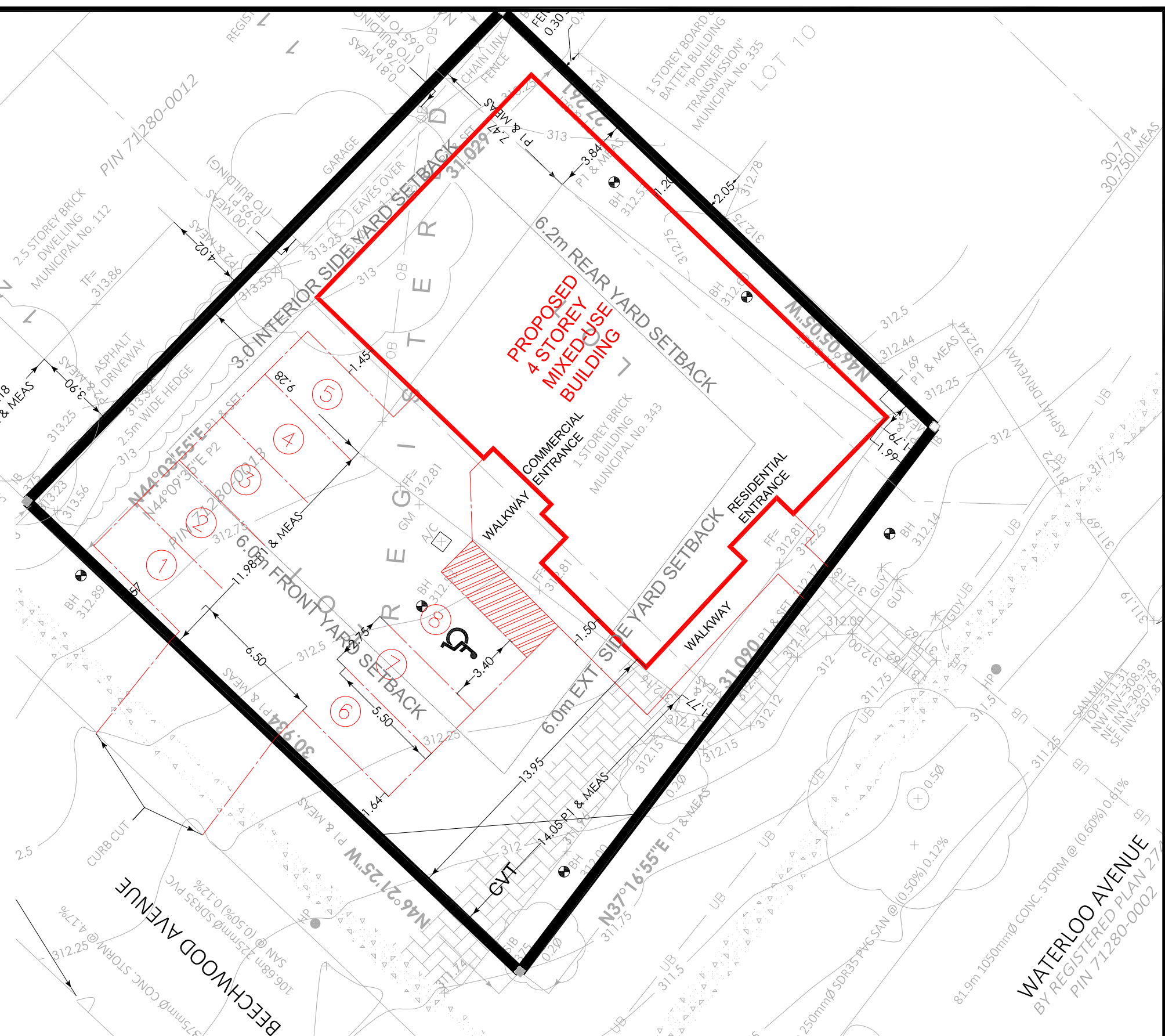
*Sally Humphries*

Sally Humphries

■ Hearn Avenue

Guelph, ■

Official Plan = "Low Density Residential"	Policy	Proposed
9.3.2 2. Maximum Height	3 storeys	4 storeys
9.3.2 3. Maximum Net Density	35 u/ha = 3 units	9 units = 100 u/ha
Zoning = "CC-3"	Regulation	Proposed
8.2a) Lot Frontage	18m	30.9m
8.2b) Lot Area	370m <sup>2</sup>	900.1m <sup>2</sup>
8.3a) Front Yard and Exterior Side Yard	Min 6.0m Max 13.0m	13.9m
8.3b) Interior Side Yard	3.0m	3.0m
8.3c) Rear Yard	20% of the lot depth to a maximum of 7.5m = 6.2m	1.2m
8.3d) Buffer Strip	A 3 m wide buffer strip is required adjacent to interior side and rear lot line A 3 m wide buffer strip shall be maintained adjacent to the street line, except for those areas required for entry ramps	3.0m ISY 1.2m RY  1.9m ESY 0.57m / 1.6m to parking
8.4a) Building Height	3 Storeys	4 storeys
8.4 Gross Floor Area	400m <sup>2</sup>	1276m <sup>2</sup>
Parking	Residential 1/unit = 9 Visitor 0.15/ unit = 1.35 Commercial 3/100m <sup>2</sup> 282/100 * 3 = 9 spaces Total Required = 20 spaces	8 spaces



343 WATERLOO AVENUE  
 CITY OF GUELPH  
 2448987 ONTARIO INC.

SCALE 1:200 (PAPER SIZE: 11x17)

PROJECT No. 211

