

Alexander Smith

██████████ Norfolk Street
Guelph ON ██████████
██████████

February 6, 2026

Re: Designation of Ontario Reformatory Heritage Conservation District

Attn: Mayor Guthrie and Guelph City Council

The Guelph Innovation District Secondary Plan (the GID Secondary Plan) envisaged a compact mixed-use community, an urban village comprised of pedestrian-oriented spaces where residents could live, work, shop and play without leaving their neighbourhood. The Plan provided ample residential development, enough to house 6,600 people. The number of residential units has since been increased to the detriment of the mixed-use vision of the GID Secondary Plan.

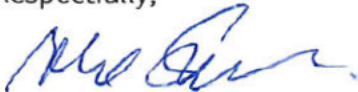
The GID Secondary Plan target for residential development within the area now identified as the proposed Reformatory Heritage Conservation District (Reformatory HCD) was zero residential units. The decision to not include residential development in that part of the Innovation District reflected the provision for ample residential units elsewhere in the GID and was consistent with planning decisions reflected in:

1. the City of Guelph Official Plan,
2. the zoning in place for proposed Reformatory HCD,
3. the definition of adaptive reuse in the GID Secondary Plan.

By identifying residential development as an acceptable adaptive reuse in the Reformatory HCD and imposing some limitations on it, the Reformatory HCD Plan advocates that residential development can be acceptable and compatible within the Reformatory HCD. If the City reaches the conclusion at some future date that residential development is not appropriate in the Reformatory HCD because it is not compatible with the preservation of the cultural heritage assets that the City has protected under Part IV of the *Heritage Act* (and are presently protected under Part III of the *Heritage Act*) or for general zoning reasons, the Reformatory HCD Plan, as written, will prevent the City from mounting a credible legal argument that no portion of the Reformatory HCD should be zoned residential.

Council is effectively making a land use planning decision to allow residential development in the GID Secondary Plan by providing for housing in the Reformatory HCD Plan.

Respectfully,



Alex Smith