



To: Mayor and Members of City Council

On behalf of Urban Park Guelph, I am writing to urge Council to **amend** the Ontario Reformatory Heritage Conservation District (OR HCD) Plan before adoption. While we support the protection of this site, the Final Plan (December 2025) contains specific policy flaws that contradict the Guelph Innovation District (GID) Secondary Plan and undermine the "stronger language" mandate Council issued in November 2024.

We request two specific amendments to prevent the erosion of this Cultural Heritage Landscape:

1. REMOVAL OF RESIDENTIAL LAND USE PERMISSIONS

The inclusion of **residential use** in "Adaptive Re-use" areas is in fundamental conflict with the site's planning history and heritage character.

- **Conflict with GID Secondary Plan:** The GID Secondary Plan focuses on "additional employment lands, with institutional uses" for the Reformatory lands. It does *not* designate the Adaptive Reuse Area for residential uses, yet, the Final HCD Plan explicitly recommends "residential" uses for **Adaptive Re-use Area B (AR-B)** and facilitates for residential uses in **Adaptive Re-use Area A (AR-A)**.
- **The "North Field" Loophole:** The Plan recommends the North Field (AR-A) be "Open Space," yet simultaneously includes a policy allowing **new construction up to four storeys** if a future "Block Plan 4" targets residential use. This is not "Adaptive Re-use" (repurposing existing buildings); this is **infill development** on a heritage landscape defined by its open agrarian character.
- **Rezoning by Other Means:** By approving an HCD Plan that "recommends" residential use, Council is effectively pre-approving a zoning change that is in conflict with the current Institutional (I.2) zoning. In the event of conflict with municipal plans and zoning this plan takes precedence over municipal planning and zoning. The plan implicitly signals that the heritage protections in the North Field are negotiable.

Recommendation: Council must direct staff to remove "Residential" as a permitted or recommended use in Sections 5.1 and the associated maps (Plate 8). The HCD Plan should restrict re-use to the adaptive re-use definition aligned with the GID Secondary Plan.

2. CLOSING THE "IMPROVEMENT" LOOPHOLE FOR WATERBODIES

The Final Plan introduces a dangerous exemption regarding the site's most critical water features (ponds, weirs, and waterways). Clythe Creek is one of the most heritage asset rich elements of the Cultural Heritage Landscape.

- **The Exemption:** Section 6.2.5 states that work may be permitted "**without requiring a heritage permit for natural conservation methods or improvements to the natural function of waterbodies**".
- **The Risk:** There is no definition of "improvement." This vague language grants the City (or a future owner) a free hand to alter or remove heritage engineered features—such as the historic weirs and canalized stone walls of Clythe Creek—under the guise of "natural function."
- **Double Standard:** No other property owner in a Guelph HCD is allowed to alter heritage attributes without a permit. The Plan lists the watercourses and weirs as heritage attributes; therefore, *any*



alteration to them must require oversight through the Heritage Permit process to ensure the *cultural* heritage is not removed without oversight for "naturalization" projects.

Recommendation: Council must direct staff to delete the permit exemption in Section 6.2.5. All alterations to waterbodies and weirs must require a Heritage Permit to ensure oversight.

We urge Council to adopt the HCD Plan with these amendments.

Respectfully,

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President
Urban Park Guelph