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Mr. James Riddell, Director
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December 31, 2004

Re: Commercial Policy Review

Thank you for the opportunity to comment on the background report for the Commercial Policy Review. Before I do however, could you please take this as **my request to address** the next Planning, Environment & Transportation Committee Meeting on this issue? I realize these meetings are often during the day but I shall take time off work to attend. I believe this is a very important process and I sincerely hope there will be full opportunities for the general public to make their views known before any decisions are made.

While the Meridian background report notes that the public interest is the primary consideration in the decision-making to come, I would have preferred to see more recognition of the very clear tension between the public interest and the interests of the commercial sector. I appreciate that this tension always exists in matters of public policy, but where I am particularly disappointed in the report is in its failure to articulate just how much more difficult it is nowadays to facilitate commercial growth that does not conflict with the public interest, and the impression it leaves that a city cannot really do much to control it.

The root of most of our difficulties today is the increasing size of the commercial developments, both at the individual store level and in the centres themselves. The model anticipated by our Official Plan is for a series of communities within the city, each served by its own commercial centres. The downtown has without doubt lost its role as the Number One commercial centre but it is also one of our community commercial centres, and commercial functions are the 'backbone' of neighbourhoods and communities. If this is "nibbled away" by allowing stores that should be in these centres to locate in other areas, then we will have a real problem. I have watched with interest how First Pro is trying to reduce the minimum store size allowed in its Cambridge power centre. I might add that I am not sure I share the enthusiasm and confidence expressed in the background report and in your December 13 staff report about the downtown's health. Old Quebec Street remains half empty and more and more stores on the main street appear to be interim leases selling anything but the specialty merchandise referred to so enthusiastically in the

report.

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The relatively compact community commercial centres in our OP mean adjacent road and transportation services are adequate and no single neighbourhood needs to bear the burden of undue traffic activity. Once the stores that traditionally located in these centres begin to increase in size, there are fewer of them to act as anchors for new centres, and the larger size means a larger service area, and thus more traffic.

While there is no denying the market place is driving this trend, led by Wal-Mart's remarkable success, the city is not powerless to act in response.

If, as the report noted in Section 3. *Commercial Trends and Changes*, the differences between community commercial centres and service commercial have "blurred", it is because we have allowed that to happen. Approving a 100,000 square foot Canadian Tire as "service commercial" was completely contrary to the spirit of the OP. And the resulting big box, like every other new Canadian Tire they build, is living proof that the report's later contention that urban design guidelines can make this kind of development fit in with our existing fabric is naive. Our own council has publicly expressed its dismay over the Canadian Tire on Stone Road. Even a councillor as pro-development as Cllr. Furfaro stated his regret over the decision to approve the Canadian Tire when he spoke at the December 2001 council meeting in opposition to the proposed Zellers development on Stone Road.

If grocery stores can no longer be anchors of community commercial areas because of their size, it is only because we allow that to happen. What will the traffic impacts be for the neighbourhoods around Clair and Gordon if the 140,000 sq. ft. Zehrs is built, or if the Watson Road store is of similar size? How long will it be before the Eramosa Road Zehrs store closes? You can blame this on the "market place" or you can place caps on store sizes.

If we see more drive-throughs in this city, it is because we allow them to happen. This community has pledged to reduce its Greenhouse Gases through emissions reductions - as a matter of policy. There is nothing, other than political will, that is stopping us from limiting drive-throughs. If SmartGuelph principles are to be used as criteria in developing the scenarios for future commercial policy, then drive-throughs have no place in this city's future.

There is no question that the new format stores and the power centres that house most of them are successful, and popular with many people (at least as long as gasoline is relatively cheap). But how well do they serve those without the means to get to them, the elderly and the infirm? To move away from community-based shopping would ensure greater automobile use, more traffic and would be unfair to those who rely on nearby shopping - and have made home-buying decisions based on the availability of local amenities. About 20 neighbourhoods in Guelph have

asked for traffic-calming measures to be implemented because of increased vehicle use. Larger centres will mean even more vehicle use.

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There is a place for municipal intervention to protect the public interest and I sincerely hope at least one the three scenarios anticipated in your December 13 staff report to the PET Committee will include a full investigation of the available options.

Yours sincerely,

Ben Bennett

c.c. Craig Manley
Mayor and Council