

**Dianna Sauderson**

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**From:** Dawn Parker [REDACTED]  
**Sent:** Monday, January 29, 2024 6:06 PM  
**To:** Clerks (SM)  
**Subject:** Comments for Council on Agenda item 6.1 "growing together"

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## **Planning & Strategic Initiatives Committee Agenda**

**Monday, January 29, 2**

The proposed MTSA / PMTSA "Growing Together" OPA and secondary by-laws are flawed. I suggest you ask staff to revise them. My comments are general, but use the Mt. Hope MTSA slice as an example.

- Our neighbourhoods are under-zoned for their current form. They are zoned for lower density than exists now. That makes it very difficult for current owners to do small in-fill projects, as they need an official plan and zoning by-law amendment. Conversely, it makes it very easy for speculators to buy out properties for "assembly", because the land value are capped at single-family residential for most investors.
- The ideal of "transitional" zones is just a gift to speculators. It's a signal to them that the land will be up-zoned. When combined with the low-rise zoning, it again invites them to purchase single family homes for speculation.
- It's well established in planning and real estate theory that when these conditions are present, landlords buy up properties and let them decay, until conditions are right to convert to high-rise (Smith's rent-gap hypothesis).
- The City has not communicated to residents that under the new zoning, no land use decision in the PMTSA will be appealable by residents. Postcards that have been sent out have been almost devoid of information and contain images of places that no longer existing in Kitchener, and will never in the future under their new plans. Postcards have omitted public engagement opportunities and have incorrectly stated that zoning is not changing at this time. Again, the lack of understanding of the zoning and its impacts for land value favours speculative investors. They know the land value for development, but the current residents do not.
- These zoning changes will not facilitate missing middle housing, because they will inflate land values beyond what a missing middle developer can pay. The City is well aware of this issue.
- The City left our neighbourhood (Mt. Hope) out of cultural heritage landscape designation, and never responded to inquires or protests about this decision. Uniquely leaving it out of this designation again favours speculative investors and invites them to acquire and assemble lands. Similar neighbours (i.e. Braun, a newer neighbourhood with less dense housing) have received the designation.
- The City's process about deciding where to intensify was flawed. They asked people at open houses where they wanted high-rise development. The people naturally said "not in my neighbourhood."
- The City CANNOT enforce the zoning it is setting in these transitional zones, and they know it. The low-rise zoning they are imposing is meaningless, because these areas are designed for intensive development by their MTSA designation. Any developer who would file an appeal to OLT would win. The only way to protect those neighbourhoods is to zoning them for intensified low-rise, i.e. a 10 unit building on any residential parcel. I have recommended to city planner and Council that that be done on many occasions.

Dawn Parker

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Kitchener

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**Prospective Students: Graduate funding opportunities and application instructions for my lab are posted through wici.ca, at <https://uwaterloo.ca/complexity-innovation/news/new-wici-graduate-funding-opportunities-2023>**

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