

105 Elmira Road North- OPA/ZBA Comment Response Matrix, June 9th 2025

Comment	Party Responsible	Response	Addressed
1.0 Development Planning			
1.1 Staff have concerns about the proposed rate of 9.12 square metres of Common Amenity Space per unit, whereas Table 6.30 of the Zoning By-law requires a minimum Common Amenity Area of 20 square metres per unit.	GSP Group	<p>We appreciate staff's acknowledgment that a reduced common amenity rate is appropriate for this Site, given its location and intended function. Excluding the buffer and drop-off areas, the common amenity rate is now 6.7 m² per unit. This does not include private balconies and patios (which range from 7.8 to 11.1 m² per unit), the pet wash area, or the terrace outside the bicycle room along Willow Road. The usability, quality, and access to on-site amenities remain unchanged.</p> <p>While Guelph's Zoning By-law requires common amenity space to off-set community amenities, enhance quality of life and support healthy communities, it applies a uniform standard across the city without accounting for the specific context of individual sites.</p> <p>A comparison chart comparing the Guelph with Kitchener, Waterloo, Brantford, and Stratford's amenity requirements was included within the submission package. The City of Guelph has one of the highest common amenity requirements amongst comparable Ontario municipalities.</p> <p>-Kitchener has no zoning requirement; common amenity is addressed through the Urban Design Manual. During the Site Plan process, staff are open to deviations from the common amenity requirements in the Urban Design Manual.</p>	Y
1.2 Planning staff recognize that a reduced Common Amenity Area rate is appropriate for the site but are not satisfied that the proposed rate of 9.12 square metres per unit achieves the intent of the provision.			Y

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		<p>-Waterloo calculates the amenity requirement per bedroom in the Zoning By-law, has a lower rate than Guelph and counts private space toward the amenity calculation.</p> <p>-Brantford has a lower rate than Guelph but does require a minimum of 50% of amenity space to be outdoors and a minimum of 25% to be indoors.</p> <p>-Stratford has no zoning requirement but does encourage common amenity space through the Site Plan process.</p> <p>In contrast, the proposed common amenity rate of 6.7 m² and design exceeds what's required and overall aligns with what is accepted in each of these municipalities.</p> <p>The proposal reflects a thoughtful and context-driven approach. The Amenity Occupancy Analysis prepared by ABA Architects included in the submission confirms that the shared spaces alone can accommodate up to 352 people, more than the projected occupancy of 338. When private amenities are factored in, the total capacity for amenity areas rises to 614 people. This is well beyond what is needed and clearly demonstrates that the proposed amenity rate is more than sufficient.</p> <p>Ownership has also emphasized based on extensive national experience with purpose-built rental apartment buildings that overproviding common amenity space often results in low usage,</p>	

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		<p>unnecessary construction and maintenance costs, and higher rents for tenants.</p> <p>Requiring more common amenity space would not enhance livability. It would ignore both lived experience and site-specific evidence and would undermine broader policy goals of efficient land use, financial sustainability, and delivering housing that meets real, not theoretical, needs.</p> <p>In summary there is no clear industry standard or a demonstrated quantifiable need to support requiring additional common amenity for this development. The proposed rate is context specific and reflects programming and a rate that responds to actual tenant needs.</p>	
1.3 Staff recommend reducing the unit count without reducing the overall residential GFA by creating more 2- or 3-bedroom units. This would reduce the overall Common Amenity requirement and would allow for some additional parking spaces to be converted to Common Amenity space without further reducing the parking rate.	Ownership/ GSP Group	<p>As noted in the City of Guelph's <i>Housing Affordability Strategy</i> (December 2024), one-person households are the fastest-growing household type and represent the largest share of renter households. Table 3-6 of the report further identifies the greatest affordability need in the one- and two-bedroom apartments. Ownership has advised that adding three-bedroom units would challenge the project's financial viability and reduce the number of affordable units overall. The proposal provides additional much needed purpose-rental housing with an affordability component which aligns with the City of Guelphs housing objectives.</p> <p>We are of the opinion that the proposed amenity rate is appropriate for the Site and that additional areas are not required.</p>	Y

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1.4 Staff also recommend considering rooftop amenity space to achieve additional amenity space on the site.	Ownership	No additional common amenity spaces are needed to meet tenant needs. The Owners have advised that solar panels are proposed for the roof. Roof top amenity would significantly reduce the number of solar panels. Further Ownership has confirmed that rooftop amenity areas are not viable without corresponding indoor spaces on the same level, which would significantly increase costs and increase the building height, potentially create overlook, trigger substantial design changes and zoning adjustments that conflict with the project's objectives. Given the Owners experience across Canada delivering and managing purpose-built rental buildings, and the Site's proximity to extensive existing community amenities, Ownership is certain that the proposed design offers the perfect amount of amenity space and have advised that adding rooftop amenity would be costly, unnecessary, and jeopardize the project's overall viability.	Y
1.5 Staff have reviewed the Parking Review in Section 4 of the Traffic Impact Brief prepared by C.F. Crozier & Associates Inc, dated March 2025, and are generally supportive of the total number of parking spaces provided on the site.	Crozier	Noted.	Y
1.6 Staff have concerns about the reduced minimum visitor parking requirements that are requested. It is recommended that the applicant increase the visitor parking to be more in line with the upper end of the visitor parking utilization rate identified in Table 9 of the Traffic Impact Brief (0.10 visitor spaces per unit).	Ownership/ Crozier	While Crozier concluded that 8 visitor parking spaces was sufficient for the Site, to address staff comments 10 visitor parking spaces are now proposed. This reflects an average of the utilization rates observed at the two comparable sites in Cambridge.	Y
1.7 A Commercial Function Study, dated October 2024 was prepared by Tate Research and peer reviewed by Watson and Associates Ltd. Tate Research provided a response to the peer review dated February 2025. The findings support the redesignation of the lands to medium density residential. Planning staff accept	Tate Research	Noted.	Y

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the findings of Tate Research's response to the peer review and have no further comments on the Commercial Function Study.			
2.0 Urban Design			
2.1 Within the UD Brief please include justification of reduced CA spaces within Section 4.1 or 4.4 with appropriate uses of maps or diagrams.	GSP Group	<p>While the Urban Design Brief provides both contextual mapping (Figure 6, page 11) and an overview of on-site amenities (Section 4.4 and Figure 12, page 36), we are providing the following response to further clarify the rationale supporting the reduced Common Amenity Area (CA).</p> <p>The subject site is in Guelph's established West End, a neighbourhood well-served by municipal facilities, parks, schools, and trails. These nearby resources function as a natural extension of the development's amenity offering, providing substantial off-site opportunities for recreation, socializing, fitness, and leisure for all ages, located within walking distance. Key nearby amenities include:</p> <p>West End Community Centre (WECC): The City's West End Community Centre is located within walking distance of the site (approximately 800 m southeast of the site). This is a fully accessible, multi-purpose recreation facility offering a large aquatic centre (public swimming pool), a twin-pad arena for ice sports, a full gymnasium, fitness facilities, indoor walking track, multi-purpose community rooms, and even a branch public library. WECC is a comprehensive community hub where residents can swim, skate, exercise, take classes, attend events, or borrow library materials. Access to such a facility greatly reduces the need for duplicative on-site amenities. The community centre is a short 3-minute</p>	Y

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		<p>drive or approximately 5-minute bike ride away and is also accessible by local transit.</p> <p>Parks and Open Spaces: The site is near several public parks, which offer a range of outdoor leisure options. Dunhill Place Playground is located to the east of the site and is accessible via an existing trail connection from Willow Road. Ellis Creek Park, west of the site, offers a children's play area and is linked via a continuous City trail running along Elmira Road North. Earl Brimblecombe Park, directly behind Mitchell Woods Public School to the south, provides open green space and playground equipment, supporting passive recreation and casual sports. A planned trail connection immediately adjacent to the site will link into the Mitchell Park Loop and Dunhill Trail system, as identified in the City's Trail Master Plan. These trails will enable residents to walk, jog or bike safely through the community and to nearby greenspaces.</p> <p>Margaret Greene Park: Although located approximately 1.6 km from the site (approximately 20-minute walk), this 9-hectare park offers sports fields, tennis and pickleball courts, playgrounds, picnic areas, trails, and a leash-free dog park. It is accessible via a connected trail network.</p> <p>Schools and Community Facilities: Just south of the site (across Willow Road) is Mitchell Woods Public School, which includes schoolyards and playground facilities that serve the neighbourhood. While not a formal park, school grounds often provide additional open space and play equipment that families in the</p>	

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		<p>area can use after school hours. There is also a church and community hall nearby on Willow Road, and a neighbourhood shopping centre within a short distance.</p> <p>This context supports the policies of the City of Guelph Official Plan (OP) emphasizes the importance of complete communities, where residents are well-served by local parks, schools, recreation facilities, and transit as outlined in Policy 3.1. This proposal meets that intent by placing new housing in a well-connected, amenity-rich setting. The OP's residential development criteria outlined in Policy 9.3.1.1.3 require that multiple-unit residential proposals be adequately served by local parks, schools, recreation facilities and transit. In this case, the site's location clearly meets this intent. The OP also encourages development to efficiently use existing community infrastructure and to support active transportation. By situating housing near existing recreational facilities and trail networks, the proposal aligns with the City's sustainability and active living goals, and it avoids duplicating large amenities on every development site, which would be a less efficient use of land and resources.</p> <p>In addition, the proposed amenity programming also directly aligns with the objectives of Section 6.3 of the Built Form Standards for Mid-Rise Buildings and Townhouses guidelines, which state that: <i>"The</i></p>	

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		<p><i>location, size and design of Common Outdoor Amenity Areas should be appropriate given the building type, unit mix, and adjacent land uses and amenities.”</i> The guideline supports a context-sensitive approach to amenity spaces where the presence of high-quality public amenities nearby should be factored into the required amount and design of on-site common amenity areas. The proposed amenities directly reflect the site’s physical context, the anticipated demographic profile of tenants, and the abundance of high-quality public amenities and open spaces in the immediate area.</p> <p>By avoiding unnecessary duplication and maximizing the value of surrounding public infrastructure, the proposal delivers an appropriate, efficient, and well-balanced mix of amenities spaces. This approach is consistent with both the Official Plan and the Mid-Rise Built Form Standards.</p>	
2.2 Within the UD Brief please include reasoning on how garbage pick up, loading bay, visitor/resident drop off bay and amenity area are expected to behave coherently in the same designated space within Section 4.5.	GSP Group	The site plan has been revised to remove the amenity label from the area adjacent to the garbage/loading zone. This area is not included in the CAS calculation.	Y
2.3 Concept Plan: On preliminary review of the site plan, staff finds the overall submitted concept plan displays signs of excessive densification without adequately addressing the requisites like common amenity spaces, parking, angular plane requirements, setbacks, etc.	GSP Group	<p>The application promotes compact built form, efficient use of land and infrastructure, and delivers much-needed purpose-built rental housing. All technical studies confirm the site can accommodate the proposed development without adverse impacts. Key points:</p> <p>-The proposed front yard setback exceeds the current NCC zoning minimum of 3 metres.</p>	Y

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		<p>-Transportation and planning staff support the proposed overall parking rate.</p> <p>-Angular plane adjustments are minor, with no shadow, overlook, or privacy impacts.</p> <p>-Common amenity space is appropriately scaled and programmed, reflecting resident needs and the surrounding amenity-rich context.</p> <p>The Planning Act supports site-specific provisions through a Zoning By-law Amendment, and there is no limit on the number of such provisions. The number of site-specific requests is not an indicator of overdevelopment, provided each request and the collective development is assessed and determined to be appropriate for the Site and surrounding neighbourhood context.</p> <p>The technical studies support that the Site can be serviced with existing infrastructure, there is no negative shadow, noise or wind impacts, the parking rate is appropriate, there are no traffic concerns, and there will be high quality landscaping provided along the property lines and interior to the Site.</p> <p>The proposal represents appropriate intensification, aligns with planning policy, and is in the public interest. Please refer to the Planning Justification Report for further details.</p>	

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<p>2.4 Staff generally have concerns with the lack of CAS and the proposed areas of CAS at-grade. Staff don't believe the intent of the definition of Common Amenity Space (CAS) in the Zoning Bylaw is being achieved, nor the intent of the City's Mid-rise and Townhouse Built Form Standards (MTBFS). For reference:</p> <p>1. CAS should be located away from building servicing, parking and loading functions.</p> <p>2. CAS should have barrier free connections to the building and public right of way and host site furnishings that meet AODA standards.</p> <p>3. The location, size and design of CAS should be appropriate given the building types, unit mix, and adjacent land uses and amenities, as well as any surface or structured parking.</p> <p>4. CAS should provide comfortable, universally inclusive, and safe spaces for pedestrians with a range of active and passive programming. Please include designs of these spaces on the LA Plans.</p> <p>A minimum of 50% of the required CAS shall be accessible at-grade outside, in one contiguous area.</p> <p>To ensure spaces are usable and appropriately scaled, the width to depth proportion of a Common Outdoor Amenity Area should not exceed 4:1.</p>	GSP Group	<p>1. Noted, the site plan has been revised to remove the amenity label from the area adjacent to the garbage/loading zone.</p> <p>2. The proposed development includes barrier-free pedestrian connections from the public sidewalk and on-site parking areas to the main building entrances and the at-grade common amenity area. Curb ramps with tactile warning indicators are provided at all key transition points, and barrier-free parking stalls are located adjacent to the main entrance with direct access to pedestrian pathways. These features align with both the AODA and City of Guelph accessibility standards. With respect to site furnishings (e.g., benches, tables, waste receptacles), these will be selected and detailed during the detailed design stage. All furnishings will be reviewed to confirm they meet AODA requirements.</p> <p>3. The proposed Common Amenity Space (CAS) has been carefully located and designed to align with the site's physical context, the building's form and function, and the anticipated needs of its future residents. The development features a mix of one-bedroom (and one-bedroom + den) suites, along with a smaller proportion of two-bedroom units, and no three-bedroom units. This unit composition suggests a target demographic of singles, young couples, and downsizing seniors rather than families with children, resulting in a different pattern of amenity use.</p> <p>The building's L-shaped footprint fronting Elmira Road North and Willow Road, enables the primary outdoor amenity area to be positioned prominently along the</p>	Y

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		<p>Elmira frontage, while vehicle access and service areas are directed to the Willow Roadside.</p> <p>The outdoor terrace and adjacent dog run are located away from parking, loading, and servicing functions, in a landscaped area that provides a comfortable, social, and secure environment for residents to relax, gather, or dine outdoors. These outdoor spaces are supported by interior amenities such as a gym, social lounge, and coworking space located nearby to allow for flexible programming and year-round use.</p> <p>In addition to these on-site features, the building benefits from proximity to several parks, schools, and the West End Community Centre, allowing the on-site amenity spaces to function as a complement to, rather than replacement for, larger community-scale amenities. The proposed amenity spaces are tailored to the actual needs of the expected resident population and reflects both the physical opportunities of the site and the broader context of the neighbourhood. This approach meets the intent of the City's Mid-Rise Built Form Standards (Section 6.3), which state that CAS design should be appropriate based on unit mix, adjacent land uses, and availability of nearby amenities.</p> <p>4. Based on the Landscape Concept Plan submitted with the OPA/ZBA package the proposed Common Amenity Space (CAS) has been designed to support a safe, universally inclusive, and comfortable pedestrian experience, consistent with the intent of the City of Guelph's Mid-Rise and Townhouse Built</p>	

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		<p>Form Standards. All addressed throughout the Urban Design Brief.</p> <p>The plan illustrates a mix of active and passive spaces, including harvest tables and BBQs for outdoor dining and social gathering, bistro and lounge seating in shaded areas, custom trellis structures to enhance comfort, a dedicated dog run area with pet-friendly elements such as a Sutera dog waste unit, and a Dero Fixit Plus station to support cycling and active mobility. Barrier-free paving provides direct and accessible connections from the amenity area to the building entrances and adjacent sidewalks.</p> <p>Site furnishings such as benches and raised planters are shown on the landscape plan; final product selections will be confirmed through detailed design. The amenity area is visually buffered from adjacent parking areas through landscaping and fencing and is located away from servicing and loading zones to provide a safe and comfortable setting. It includes spaces designed to support a variety of programming ranging from quiet sitting areas to interactive social spaces for pets and families and is intended to serve residents of all ages and abilities.</p> <p>The proposed development provides approximately 45% of the required Common Amenity Space (CAS) as an at-grade, outdoor, contiguous area. While this falls slightly below the 50% guideline noted in the City's Built Form Standards, it still meets the overall intent of the guideline by offering a high-quality, usable, and well-integrated outdoor amenity space that is safe,</p>	

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		<p>barrier-free, and functionally connected to interior amenity areas.</p> <p>The proposed CAS is designed as a contiguous outdoor terrace space along the Elmira Road North frontage, resulting in a width-to-depth ratio well within the maximum 4:1 ratio noted in the guidelines, ensuring the space is comfortable, appropriately scaled, and usable for a variety of passive and active functions.</p> <p>Given the strong integration of this outdoor space with the interior amenity rooms, its placement away from loading and servicing areas, and its adjacency to the public realm, the proposed CAS maintains a high level of design quality and supports a context-sensitive, resident-focused amenity strategy.</p>	
Staff would like to note that the 3m buffer strip is not to be included under calculations of CA space.	ABA Architects	This has been removed from the calculation. See the updated Site Plan and site statistics.	Y
2.5 Moreover, the 246sqm space designated as common amenity north of building entrance, does not meet the required definition of CAS, especially when the function of such space is shared with garbage pickup, loading space, pick-up/drop-off bay for residents.	ABA Architects	This has been removed from the calculation. See the updated Site Plan and site statistics.	Y
2.6 Considering the above notes, the resulting CAS at-grade is less than 400sqm. Staff strongly suggests the applicant look at opportunities on extending the CAS to facilitate more programmable functions for residents.	GSP Group	In addition to the design and functional considerations described in the above responses, it is important to note that this development is a purpose-built rental project, with a unit mix that is primarily composed of one-bedroom and one-bedroom + den suites, along with a smaller proportion of two-bedroom units. This composition reflects a target demographic of singles, young couples, and downsizing seniors, groups whose amenity needs differ significantly from larger families. As such, the	Y

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		<p>scale and programming of the CAS have been calibrated to prioritize quality and usability over quantity.</p> <p>The design includes a combination of indoor and outdoor spaces such as fitness/yoga rooms, coworking lounges, social spaces, and a dog run that directly respond to the lifestyles and preferences of smaller households. The CAS is located away from servicing and parking areas, and designed to be inclusive, barrier-free, and supportive of both active and passive functions.</p> <p>Furthermore, the site benefits from its proximity to an exceptional network of off-site amenities, including the West End Community Centre, neighbourhood parks, and an integrated trail system. This broader amenity context enables a context-sensitive, balanced amenity strategy that meets resident needs without requiring further expansion of the on-site CAS.</p> <p>In addition, the Owner, HIP Developments, brings experience and success in delivering thoughtfully programmed amenity spaces in comparable rental projects, such as The Bright Building and The Flats at Rainbow Lake in Kitchener. These examples reflect the developer's commitment to creating inviting, modern spaces that are well-used by residents and tailored to their lifestyle preferences.</p>	
2.7 Staff would encourage the applicant to consider proposing additional CAS on the roof top to help compensate the required amount of CAS. Rooftop CAS should have a minimum setback of 2 metres from the roof edge.	Ownership	Please refer to the comment response on comment 1.4.	

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2.8 Staff encourage the use of green roofs and white roofs to reduce energy consumption. Green roofs are strongly encouraged on mid-rise buildings. A green roof allows vegetation to grow on top of a structure and may act as a Common Amenity Space while also providing a stormwater function and other environmental benefits	Ownership	Noted.	N/A
2.9 Zoning requires a minimum of 6m setback of the building facing Elmira Road north to maintain sufficient space for landscaping (e.g.: street trees). Staff note the proposed reduction of 4.3m could be considered if appropriate clearances to overhead hydro, property line and building face can be achieved for large/medium sized deciduous canopy trees. Refer to the City's Tree Technical Manual.	GSP Group	The current NCC zone permits a minimum front yard setback of 3 metres. The proposed 4.3 metre front yard setback is not anticipated to conflict with landscaping along the front lot line. A Landscape Plan will be provided through the Site Plan process.	Y
2.10 Staff would like to refer to the Midrise and Townhouse Built Form Standards, Section 7.1.6, where a 1.5m setback is recommended between the 4th and 5th floor to ensure appropriate scale and transition. This would also help with achieving the angular plane from the north side of the subject property.	GSP Group	<p>The proposed angular plane along Willow Road is 46-degrees, which represents a minor deviation of 1-degree from the City of Guelph's requirement of 45-degrees.</p> <p>Along the north interior side yard, the proposed angular plane is 49 degrees representing a minor 4-degree variation from the standard 45-degree requirement. However, the encroachment is limited to a small portion of the building, and the upper storeys are articulated with recessed balconies that reduce the visual massing. This design approach pulls back portions of the façade and softens the transition to the adjacent low-rise property, mitigating the impact of the angular plane variation.</p> <p>The proposed angular plane along Elmira Road North is 43-degrees, which complies with the City of Guelph's angular plane requirement. The angular plane along the rear yard at the east of the Site is 41-degrees, which complies with the City of Guelph's angular plane requirement.</p>	Y

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		The Mid-Rise and Townhouse Built Form Standards (Section 7.1.6) recommend a 1.5 m step back between the fourth and fifth floors to help achieve appropriate scale and transition. While a continuous step back is not proposed, the use of recessed balconies and upper-level articulation meets the intent of this guideline by creating visual relief, supporting outdoor use, and reducing perceived height from the street and adjacent properties. It is also important to note that the Zoning By-law does not mandate setbacks as a requirement.	
2.11 Staff would request the applicant not use spandrel glazing at-grade and reorganise the interior functions requiring spandrel elsewhere to help increase transparency along Elmira Road N.	ABA Architects	Noted.	N/A
2.12 Staff recommends incorporating texture into the surface treatment of Material Palette 3 – Precast Concrete in Dark Grey. This addition would help avoid the appearance of a monotonous dark concrete wall with only fenestrations, ensuring a more visually engaging and welcoming main entrance.	ABA Architects	Noted.	N/A
2.13 Staff requires the Sun-Shadow study re-submitted following the terms of reference available on the City website. Please ensure the shading analysis performed through a series of diagrams is based on requirements specified under the terms of reference for additional clarity. Refer to points 6,7,8 under the section- Materials to be submitted with Sun and Shadow study.	ABA Architects/ GSP Group	An updated shadow study graphic has been provided to illustrate the as-of-right built form. A shadow study was not formally required as part of the OPA/ZBA application.	N
2.14 In addition to the comments submitted for CA spaces, based on the submitted shadow analysis, staff observe that the demarcated amenity area at the north end of the building remains shaded through the months of April- Sep- December, which makes the proposed space less desirable to be considered as a CA space.	GSP Group	An updated shadow study graphic has been provided to illustrate the comparative impacts of the as-of-right built form under the current “Neighbourhood Commercial Centre (NCC)” zoning and the proposed development. As shown, the proposed development’s shadow impacts are generally comparable to those permitted under the existing zoning, including the extent of shadowing on the designated Common	Y

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		<p>Amenity Space (CAS) located at the north side of the building.</p> <p>Importantly, this outdoor amenity area has been purposefully designed for year-round functionality. It is directly connected to adjacent indoor amenity rooms, supporting resident use during all seasons. It is also important to note that the primary shadowing occurs in the morning hours. By approximately 2:00 PM onwards, the CAS receives full sun exposure, enhancing its usability during peak afternoon periods.</p>	
2.15 As part of a formal Site Plan Application, please ensure to submit an Arborist Report along with the TIPP plans. This report should include information/inventory regarding site trees (health, condition, species, etc.), as well as specifying measures required for protection, mitigation of tree injury and monitoring efforts, as per the City's Tree Technical Manual.	GSP Group	The Site Plan Pre-con requirements for a complete application require a Landscape Plan, Cost estimate and Tree Inventory & Preservation Plan. An Arborist Report was not required. The landscape team will reach out to staff to discuss further.	N/A
2.16 The trees to be protected are neighbouring trees, so extreme care is to be provided to mitigate any impacts to them. Please ensure to include mitigation measure notes and details such as root sensitive excavation, finish grading within TPZ, use of air spading, & oversight by the consulting Arborist, etc.	GS P Group	Site Plan comment noted.	N/A
2.17 Staff support the proposed removal of existing trees within the development site, located along the east property line that consist of Poplar, Black Willow and Siberian Elm. Most of these trees are in poor health or structure and will be exempt from requiring compensation. Of the 16 trees proposed for removal, there are 10 that will be exempt. The remaining 6 trees have a total DBH of 465.5cm. Using the Aggregate Caliper Formula of the Tree Technical Manual that is equal to 78 new trees to be planted on site. Please consider this when designing the Landscape Plan as part of a formal application. Staff will consider a combination of new trees on site and cash in lieu as the development application evolves. Please refer to the Built Form Standards for Mid Rise and Townhouses.	GSP Group	The landscape team will have further discussions with staff about compensation through the Site Plan process.	N/A

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2.18 Please provide a Landscape Plan prepared and stamped by a full member of the OALA as part of a formal application.	GSP Group	Site Plan comment noted.	N/A
2.19 Medium stature trees should have access to a minimum soil volume of 18m ³ . Larger stature trees may require soil volumes up to 30m ³ per tree. Best practices for securing long term tree health should be applied and adhered to.	GSP Group	Site Plan comment noted.	N/A
2.20 60mm caliper tree should be planted for every 8 parking spaces within the parking field or within 5 metres of the vehicle use area to help break up hard surfaces and minimize the heat sink effect (in addition to other on-site Landscaped Open Space tree planting requirements). For front yard tree planting on sites containing mid-rise buildings, 1 medium or large stature front yard tree is required for every 10 metres of property frontage. Strategically locate shade trees in key areas, such as near play areas, walkways, within Common Outdoor Amenity Spaces and amongst surface parking areas. These notes will help determine what proposed trees are considered as part of the compensation calculation and what are considered part of standard landscaping on site.	GSP Group	Site Plan comment noted.	N/A
2.21 Please provide a completed Sustainable Development Checklist as part of a formal application.	ABA Architects	Site Plan comment noted.	N/A
2.22 The use of native species is strongly encouraged.	GSP Group	Site Plan comment noted.	N/A
2.23 The implementation of low impact development (LID) measures is encouraged (OP Policy 8.1.1).	ABA Architects	Site Plan comment noted.	N/A
2.24 Site and Building design that reduces energy and water consumption, improves air quality, water quality and waste management is encouraged (OP Policy 8.1.1)	ABA Architects	Site Plan comment noted.	N/A
2.25 The location of servicing from the ROW should avoid open soft areas that could impact efforts to increase tree canopy coverage on the site. In reference: along the north property line is a STM line shown through the buffer, yet the landscape concept plan shows the preference for trees.	MTE/ GSP Group	Site Plan comment- noted.	N/A
2.26 Please refer to the City's Urban Forest Management Plan and OP policies regarding urban forest protection, maintenance and	GSP Group	Site Plan comment- noted.	N/A

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growth objectives. Consultants are encouraged to look for all opportunities to plant trees as part of this proposed development – providing large canopy trees that provide benefit to the environment, human health and economy. Please refer the City’s Tree Technical Manual of direction on soil volumes, quality, plant spacing, etc.			
2.27 General impression of the submitted concept plan is an over-development of the site, resulting in constraints to common amenity space requirements. Staff would encourage the applicant to revisit the density and layout of site and achieve a site plan which has more synergy between all the urban design elements.	GSP Group	<p>See response to comment 2.3.</p> <p>From an urban design perspective, the proposal demonstrates the following key merits:</p> <p>Appropriate Transition and Massing: The building’s L-shaped form frames the public realm, supports an active streetscape along Elmira Road North, and transitions sensitively to adjacent low-rise uses through articulated upper storeys and minor angular plane deviations, with no significant impacts on privacy or overlook.</p> <p>Public Realm Contribution: The front yard setback exceeds the current NCC zoning minimum of 3.0 metres, providing space for landscaping, soft edges, and pedestrian movement, enhancing the streetscape experience.</p> <p>Design Cohesion: The architectural expression, massing, and open space design reflect a coordinated approach that balances-built form with open space, privacy, and access considerations.</p>	Y
3.0 Engineering			
3.1 The servicing capacity analysis was completed January 15, 2025, prior to the submission of the application. The results were as follows: <u>Water Capacity</u>	MTE	Noted.	Y

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<p>The model results indicate that the water distribution system at the proposed development location provides pressures that are within the City's acceptable operating range and the required fire flow has been met.</p> <p><u>Sanitary Capacity</u> The applicant's consultant has satisfactorily worked through the requirements of the wastewater capacity analysis framework in the Development Engineering Manual therefore the sanitary system can accommodate flows from the proposed development.</p>			
3.2 Based on review of the Functional Site Grading and Servicing Plans, the design appears to demonstrate that the site can be graded as per DEM requirements. More detail will be required at the time of site plan, where the grading plan will be reviewed in greater detail.	MTE	Noted.	Y
<p>3.3 Additional detail required at the site plan stage on the Site Grading Plan:</p> <ul style="list-style-type: none"> -Site grading plan to be designed in accordance with section 6.2.1 of the DEM. -Site grading and servicing plans are required to be separate drawings -Show maximum ponding elevations. -Show all road restoration works within the public right of way. -The construction of the services in the right of way may require the full closure of Elmira Road to complete the works. 	MTE	Site Plan comment- noted.	N/A
<p>Additional detail required at the site plan stage on the Servicing Plan:</p> <ul style="list-style-type: none"> -Site servicing plan to be designed in accordance with section 6.2.2 of the DEM. -Site grading and servicing plans are required to be separate drawings. -Provide invert information for all existing and proposed infrastructure. 	MTE	Site Plan comment- noted.	N/A

Comment	Party Responsible	Response	Addressed
-LID shall be designed in accordance with acceptable standards. SWM report, cross sections & details on civil drawings should all reference applicable design guidelines.			
<p>3.4 Based on the review of the water quantity information, the design appears to demonstrate that the site can meet the DEM requirements. Additional detail to be included at site plan shall include, but not be limited to:</p> <p>-Catch basin DI7 is located in a low spot where stormwater will pond on neighbouring properties before spilling onto the proposed site plan parking lot and out letting overland to Willow Road. to ensure the ponding area does not impact neighbouring properties the catch basin shall the sized to accommodate a 100-year storm assuming 50% blockage. Provide the following calculation to demonstrate the sizing.</p> <p>-Weighted runoff coefficient will be required for the development to demonstrate that the development meets the 0.75 runoff coefficient as identified in the report. If the weighted runoff coefficient is higher than the designed 0.75 runoff coefficient than the weighted runoff coefficient shall be used.</p>	MTE	Site Plan comment- noted.	N/A
3.5 The water quality criteria is to provide enhanced level of water quality treatment. Staff have reviewed the proposed stormwater management strategy with respect to quality control and have no concerns currently.	MTE	Site Plan comment- noted.	N/A
<p>3.6 The water balance criteria is to maintain the pre-development recharge rate under post-development conditions and to provide a minimum of 5mm volume control.</p> <p>The water balance component of the Functional Servicing and Stormwater Management Report has been reviewed by staff, and it has not been completed in accordance with City requirements. The Stormwater Management Report indicates that the water balance can be achieved through an infiltration gallery proposed beneath the parking lot. The invert elevation of the proposed gallery is 321.09 m, however, this does not meet the minimum 1.0 m separation</p>	MTE	<p>Invert elevations are not shown on the Functional Grading and Servicing Plan as this is a Functional design. The infiltration gallery can easily be raised to 322.00 to maintain a minimum 1m separation from the high groundwater elevation.</p> <p>As mentioned in the City's comments; additional permeameter testing is required at the newly proposed gallery elevation. We do not object to this. Additional testing can be completed at Site Plan, however; to provide the City with some level of</p>	Y

Comment	Party Responsible	Response	Addressed
<p>required above the seasonal high groundwater elevation currently identified in the provided groundwater monitoring program report at 320.30 m.</p> <p>In-situ permeameter testing was completed at an elevation of 321.03 m within the proposed infiltration trench area and approximately at the invert elevation of the infiltration trench. While this testing was conducted approximately 2 m below existing grade, it does not satisfy the required 1.0 m vertical separation from the high groundwater table. As such, the infiltration design must be revised to meet the requirements of the DEM standards.</p>		<p>comfort at the ZBA stage, granulars with high infiltration rates can be imported to bridge the change in elevation of the gallery. We have shown that we can infiltrate into the lower soil lithology. If the upper soils are not as conducive to infiltration, the granulars between two soil types will be suitable to infiltrate.</p>	
<p>3.7 The test pit logs indicate a change in soil lithology at 321.13 m, transitioning from compact mottled brown-grey silt to loose-to-compact medium to coarse sand with trace gravel & silt. The Stormwater Management Report must evaluate how this change in subsurface conditions will affect the permeameter testing results and the associated factor of safety calculations. If the intention is to raise the invert of the infiltration gallery to maintain 1 meter of separation, the invert of the gallery may be in different soil strata & additional permeameter testing would be required as per DEM standards.</p> <p>The water balance assessment and infiltration system sizing calculations shall be updated accordingly.</p>	MTE	<p>See response above. The elevation change of the gallery, will not have an impact on the overall balance. We will show this at the Site Plan stage.</p>	
<p>3.8 A Groundwater Level Monitoring Program Report was submitted as part of the formal application dated April 29, 2025. Six boreholes were installed on the subject site and have been recording continuous groundwater level data from September 2024 to April 2025. Based on the monitoring results, the owner has identified the seasonal high groundwater level as 320.3 m. We will require that monitoring continue to capture data for a complete 12-month period covering all four seasons to support the site plan application. If the additional data demonstrates that the seasonal high groundwater table is greater than what is proposed now, revision to the site plan design shall be required. This additional monitoring data will be required prior to site plan approval.</p>	CVD	<p>CVD confirmed that they reviewed the groundwater level measurement tables provided in the reports and noticed that two of the numbers are off by 1 cm. It is a rounding error. The Geotechnical Report has been updated to reflect this, and the number that is missing on the water level table in the Ground Water Level Monitoring Program Report has now been included.</p> <p>The actual seasonal high was provided to city staff on April 30, 2025, so no estimate is required.</p>	

Comment	Party Responsible	Response	Addressed
However, the Groundwater Level Monitoring Program Report has been reviewed by City staff & it has not been completed in accordance with City requirements. We have seen different reports and iterations of the groundwater level monitoring program & geotechnical reports, with different levels of information & recommendations for determining the seasonal high groundwater table. A revised report shall take all the information & considerations of the previous reports & provide a professional opinion from a qualified person to determine a conservative estimate for the seasonal high groundwater elevation. This professional opinion is required prior to zoning approval & this conservative estimate may be revised as additional groundwater data is collected during the SPA review process.		The monitoring began in September 2024. The loggers are still in the well and they will continue the monitoring to provide 12 months of data.	
3.9 Conceptual Plan (drawing FD) dated 01/08/2025 by Crozier Consulting Engineers is generally acceptable. Additional details related to revised back-to-back left turn lane west of Flaherty Drive will be further reviewed at SPA process.	Crozier	Site plan comment- noted.	N/A
3.10 Signages details (i.e. fire route, EV parking signs etc.) that are identified in Pavement Markings and Signage Plan (drawing PMSP) dated 01/10/2025 by Crozier Consulting Engineers to be revised at SPA process.	Crozier	Site plan comment- noted.	N/A
3.11 Transportation plans (Drawings FD & PMSP) and Transportation Impact Brief (TIB) are missing professional Engineer endorsements. All Transportation plans and study must be stamped and signed by a professional Engineer.	Crozier	A stamped Conceptual Design was submitted to the City on March 5, 2025. An updated TIB (stamped) and PMSP was provided with this submission. A stamped PMSP drawing will be provided through SPA.	N/A
3.12 Section 3 of the TIB incorrectly identifies Willow Road fronting the proposed development with a posted speed limit of 40 km/h. However, Willow Road fronting the development operates with a regulatory speed limit of 50 km/h and flashing 40 km/h (school zone) during specific times. Therefore, the sight distance analysis must be completed for posted speed limit of 50 km/h. Parking review will be reviewed by City's Planning staff.	Crozier	This has been incorporated in the updated TIB.	Y

Comment	Party Responsible	Response	Addressed
3.13 This development is situated in a walkable, bikeable, transit-friendly area, making it well-suited for TDM. The site is located adjacent to existing cycling network & adjacent to the future planned quality transit network, indicated in the 2022 TMP.	Crozier	Noted.	N/A
3.14 Sustainable Transportation staff are generally supportive of the proposal; the submitted TIB identifies TDM measures that will support residents & visitors to choose sustainable modes of transport. Detailed design of sustainable transportation features, such as bike parking & the connections to sidewalks & cycling facilities within the ROW, can be discussed at SP.	Crozier	Site Plan comment- noted.	N/A
3.15 Staff recommend updating S 5.1 of the TIB to describe the existing cycling network more accurately: there are existing painted bike lanes on both Willow & Elmira, however none of the bike lanes are 'protected' & the cycling spine network planned for Willow does not extend to this site under the current TMP.	Crozier	This has been incorporated in the updated TIB.	
3.16 Environmental: No further comments.	CVD	Noted.	Y
3.17 The Feasibility Noise Study has been reviewed & it has not been completed in accordance with MECP and City requirements. Comments on the Feasibility Noise Study are attached.	GHD	An updated Feasibility Noise Study is included within the submission package.	N
3.18 Source Water Protection: No further comments.	Ownership	Noted.	Y
<p>3.19 Engineering and Transportation Services supports approval of the Official Plan and Zoning By-law Amendment subject to the application of a Holding Provision as detailed below: ‘H’ – applied to 105 Elmira Road North</p> <p>Purpose: To ensure that development of the subject lands does not proceed until the following condition has been met to the satisfaction of the City:</p> <p>The Owner shall prepare an updated water balance design to the satisfaction of the City and an updated feasibility noise study too the satisfaction of the City.</p>	MTE/ GSP Group	<p>A Holding Provision (‘H’) for water balance and noise feasibility is not warranted in this instance for the following reasons:</p> <p>The Official Plan supports the use of Holding Provisions where submission and acceptance of special studies are required prior to development approval, particularly when such studies are not addressed through the SPA process, or where there is uncertainty about their outcomes or where development would be considered premature until conditions can be met. That is not the case here.</p>	Y

Comment	Party Responsible	Response	Addressed
		<p>Water balance: although the DEM requires a water balance assessment during the OPA/ZBA process, this is also a standard SPA requirement. MTE has completed a detailed water balance analysis and confirmed that they are satisfied that the site can provide a water balance that is consistent with the City requirements. There is a minor update (that is immaterial) will be submitted with the SPA application.</p> <p>Noise: An updated Feasibility Noise Study is included within the submission package. The updated study continues to conclude no adverse noise impacts from the proposed development adjacent to existing residential uses. A detailed Noise Study, which is required through the SPA process, will specify any mitigation measures necessary to ensure compliance with noise standards.</p> <p>These studies and any updates are standard SPA requirements, and the technical analyses confirm no concerns with the OPA/ZBA or the Site's ability to comply with the applicable policies which will be demonstrated through the SPA process. Imposing a Holding Provision would be redundant, add an additional application fee and would add unnecessary time to the approval process. As such we are respectfully requesting that planning staff do not propose the holding provision recommended by engineering staff for the Site.</p>	
4.0 Environmental Planning			
4.1 During Site Plan, bird-friendly design will be required to mitigate bird collisions with glass and reflective surfaces. The Bird-friendly	ABA Architects	Site Plan comment- noted.	N/A

Comment	Party Responsible	Response	Addressed
Design Guideline can be found at: https://guelph.ca/wp-content/uploads/Attachment-1 Bird-friendlyDesignGuideline.pdf			
5.0 Parks Planning			
5.1 The purpose of the Zoning By-law Amendment application is to redesignate the subject lands from “Neighbourhood Commercial Centre” (NCC) to a specialized “Medium Density Residential” (RM.6-XX) designation to facilitate the proposed development. Park and Trail Development has no objection to the proposed Zoning By-Law and Official Plan Amendment to permit a six (6) storey 126-unit purpose-built rental apartment building.	GSP Group	Noted.	Y
6.0 Other			
6.1 A Statutory Public Meeting was held on May 13, 2025. Comments raised by Council members are summarized below. Please ensure your next submission includes a public meeting comment summary which includes what comments were received and if/how the comment was responded to in a revised submission. -Questions and concerns were raised about the proposed reduced minimum parking requirement and the reduced minimum common amenity area requirement. -Concerns were raised about the proposed unit sizes, with a request that more 3-bedroom units be included. -Concerns were raised about the proposed access. It was suggested that access off Elmira Road North may be more appropriate.	GSP Group	See the attached Public Meeting Comment Summary.	Y