

**First Submission Comment Matrix**  
**111-193 Silvercreek Parkway North - Willow West Mall**  
**Proposed Zoning By-Law Amendment OZS20-017**

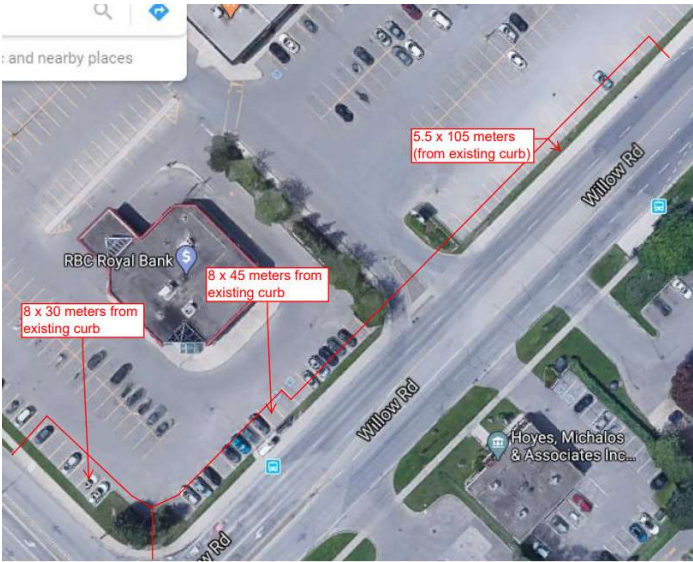
1824

Last Updated April 22, 2022

#	First Submission Comment	How staff comment has been addressed in this submission.
<b>Jyoti Pathak, Parks Planner Parks, Public Services,</b> <b>T 519-822-1260 x 2431 E jyoti.pathak@guelph.ca March 11, 2021</b>		
1	<p><b>Zoning Bylaw Amendment:</b>  Park &amp; Trail Development has <b>no objection</b> to the proposed Zoning By-Law amendment to rezone the property from the “Specialized Community Shopping Centre” Zone to permit two six storey apartment buildings to be regulated by the to be regulated by the “High Density Apartment” (R.4B) Zone. City’ parkland dedication bylaw requirements would need to be addressed prior to issuance of any building permits as follows:</p> <ul style="list-style-type: none"> <li>• Proposed development includes two six-storey residential apartment buildings with a total of 148 residential units at a net density of 24 units/ha.</li> <li>• According to sections 18 and 17.(c) of the Parkland Dedication By-law (2019)-20366 the rate for payment in lieu of parkland conveyance will be the greater of the following: <ul style="list-style-type: none"> <li>• <b>For the proposed development of 148 dwelling units the ‘1 hectare per 500 dwelling units’ is equal to 0.296 ha which is approximately 4.75% of the subject site area of 6.23 ha.</b></li> </ul> </li> <li>• A narrative appraisal report of the subject property will be required to determine the Payment in lieu of Parkland amount prior to submission of any building permit applications. As per Section 21 of Bylaw (2019)-20366, the appraisal is only considered valid for one (1) year. The appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada. The property owner is responsible for the cost and to arrange for the appraisal. We recommend submitting the appraisal two months ahead of the building permit application to avoid delays.</li> </ul>	<p>Please provide the amount of cash-in-lieu of parkland that has been paid to the City. For example, at the time of the building permit issuance for the construction of the Kentucky Fried Chicken building.</p> <p>The cash-in-lieu amount will be paid prior to the issuance of a building permit in accordance with the legal requirements in effect at that time.</p>

	<ul style="list-style-type: none"> <li>• The payment in lieu of parkland for the current proposal has been determined to be <b>5%</b> of the market value of the subject property of 6.23 ha, however the final cash in lieu of parkland amount will depend on the details of the approved development, the parkland dedication rate in effect at the time of the issuance of the first building permit and the estimated market value of the land a day before issuance of the first building permit.</li> </ul> <p><b>Parkland Dedication:</b> Parkland dedication is required for the proposed development in accordance with the City of Guelph Parkland Dedication By-law (2019)-20366, as amended, or any successor thereof. Park and Trail Development recommends Payment in lieu of Conveyance of Parkland prior to issuance of any building permits.</p> <ul style="list-style-type: none"> <li>i The equivalent of Market Value of 1 hectare per 500 dwelling units; or</li> <li>ii 5% of the total Market Value of the Land.</li> </ul>	
2	<p><b>Conditions of Development:</b> Park &amp; Trail Development recommends the following conditions for the development approval:</p> <ol style="list-style-type: none"> <li>1. The Owner shall be responsible for <b>payment in lieu of conveyance of parkland</b> to the City to the satisfaction of the Deputy CAO of Public Services or their designate, pursuant to s. 42 of the Planning Act and in accordance with the City’s Parkland dedication By-law (2019)-20366 as amended or any successor thereof, prior to issuance of any building permits.</li> <li>2. Prior to the issuance of the first building permit, the Owner shall provide to the Deputy CAO of Public Services or their designate, <b>a satisfactory narrative appraisal report</b> prepared for The Corporation of the City of Guelph for the purposes of calculating the amount for payment in lieu of conveyance of parkland pursuant to s.42 of the Planning Act. The value of the land shall be determined as of the day before the day the first building permit is issued. The narrative appraisal report shall be prepared by a qualified appraiser who is a member in good standing of the Appraisal Institute of Canada and shall be subject to the review and approval of the Deputy CAO of Public Services or their designate.</li> <li>3. Notwithstanding the foregoing, if the narrative appraisal provided by the applicant is not satisfactory to the Deputy CAO of Public Services or their</li> </ol>	<p>The cash-in-lieu amount will be paid prior to the issuance of a building permit in accordance with the legal requirements in effect at that time.</p>

	designate, the City, acting reasonably, reserves the right to obtain an independent narrative appraisal for the purposes of calculating the amount for payment in lieu of conveyance of parkland.	
3	<p><b>Summary:</b> The above comments represent Parks Planning, Park &amp; Trail Development's review of the proposed development. Based on the current information provided, we would <b>support</b> the proposed development subject to the conditions outlined above.</p>	Noted.
<p><b>Adam Laranjeiro, Planning Technician, Upper Grand District School Board</b>  <a href="mailto:adam.laranjeiro@ugdsb.on.ca">adam.laranjeiro@ugdsb.on.ca</a> March 1, 2021</p>		
4	<p>Please be advised that the Planning Department <b>does not object</b> to the proposed application, subject to the following conditions:</p> <ul style="list-style-type: none"> <li>• That Education Development Charges shall be collected prior to the issuance of a building permit(s).</li> <li>• That the developer and the Upper Grand District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the permanent development sign advising prospective residents about schools in the area.</li> </ul>	Noted.
5	Furthermore, we <b>support</b> the proposed internal sidewalk connections as noted on Astrid J. Clos Planning Consultants' Concept Plan dated December 2, 2020. This would provide a direct connection to the new development through the Willow West Mall and promote active transportation by allowing students to safely walk to and from school.	Noted.
<p><b>Jim Hall, Noise Engineering Comments (mark-up of Noise Study)</b>  <a href="mailto:Jim.Hall@queph.ca">Jim.Hall@queph.ca</a> August 18, 2021</p>		
6	Mark-ups of the Valcoustics report provided. No changes or additional information requested.	Noted.
<p><b>Michelle Thalen, Engineering Comments</b>  <a href="mailto:Michelle.Thalen@queph.ca">Michelle.Thalen@queph.ca</a> June 2, 2021</p>		
7	<p>Traffic Services: Transportation Services staff have reviewed the submission of "111-193 Silvercreek Parkway North Transportation Impact Assessment" prepared by Paradigm Transportation Solutions Limited and offer the following comments.</p> <p>1. Staff are generally in support of this Zoning By-law Amendment application <b>however the proponent should modify the existing right-in/right-out/left-in driveway on Willow Road,</b></p>	The proposed plan has been revised to address this comment.

	with an appropriate angle and narrow driveway lanes. The current configuration is not considered effective in discouraging the left-out traffic. This is evident from the field observations and traffic data collected by the consultant.	
8	Sustainable Transportation: 2. Staff are generally supportive of the sustainable transportation recommendations outlined in the TIA. During detailed site design please refer to the Site Plan Procedures and Guidelines document for bike parking ratios.	Noted. This information will be provided through the Site Plan process.
9	<p>3. Future in-boulevard cycling facilities are planned along Willow Road and Silvercreek Parkway, approximately 105 m and 30 m respectively measured from the curb returns at the intersection of Willow Road and Silvercreek Parkway (see attached diagram). The cycling facilities will tie into the existing bike lanes on both roadways. As such, improvements to this intersection are identified in Guelph's Official Plan and will require a road widening as illustrated in the attached diagram, to be dedicated prior to the approval of this development application;</p> <p>Diagram provided by Michelle Thalen.</p> 	Petroff has shown on Concept Plan.
10	4. Staff recommend unbundling parking, per Section 6.1.4 of the TIS; and	Noted.
11	5. The provision of electric vehicle charging stations is strongly encouraged to support	Noted. This will be addressed through the Site Plan approval process.

	residents and visitors who own Electrical Vehicles.	
12	Municipal Services: Servicing Capacity: The provided information for the proposed development was assessed in the City of Guelph's water model. Based on the model results, the water system was able to provide adequate pressures for servicing the site. The pressures were within the preferred operating range specified in the 2009 Master Plan and available fire flows ranged from 235-298 L/s, exceeding the calculated FUS requirement of 100 L/s.	Noted.
13	The City's wastewater collection system's ability to accommodate flow from the planned redevelopment of the Willow West Mall was also analyzed within the City's wastewater model. The model results suggest the local sewer on Willow Rd currently flows at 1% (dry weather flows - DWF) to 3% (wet weather flows - WWF) of its full capacity. The sewer is projected to flow at 47% (DWF) to 48% (WWF) of its full capacity post-development as proposed. Looking downstream along Margaret Greene Park, the receiving trunk sewer is projected to flow at 12% (DWF) to 29% (WWF) of its full capacity post-development, which is an increase from the 10% (DWF) and 27% (WWF) which it flows at currently under existing conditions. Looking along Westwood Rd crossing the Hanlon Expressway, the model shows that this sewer (Diam. 300ø) becomes surcharged under WWF post-development conditions. This pipe is very flat and is receiving flows from both northern and southern Silvercreek Parkways sewers. As such, the proposed flows of 16.2 L/s will need to be reduced by decreasing the amount of proposed units in the building(s). The design team will need to examine the proposal to determine an appropriate reduction in units to reduce the flows and discuss and justify this reduction in the FSR. Please note that flow control sewers are discouraged and will not be considered as an alternative to a reduction in units.	Stantec in coordination with the City confirmed that downstream capacity is available based on more recent study information.

14	<p><b>Stormwater Management:</b></p> <p>1. Has infiltration of the roofwater been considered? The geotechnical report had recommended removal of some of the underlying materials due to structural support requirement for the foundation. Can this idea not be expanded to include importation of suitable fill materials for infiltration as well? Low impact development was included in the criteria as a possible strategy to alleviate the existing storm sewer surcharging experienced locally during the 5yr event.</p>	<p>The proposed building and underground parking limits and the required setbacks don't provide the opportunity to provide infiltration.</p>
15	<p>2. The quality control devices proposed in the FSR will need to be re-evaluated for TSS removal. If the parking lot discharge is being pretreated with the CB Shield as proposed, then the final OGS unit (currently the Stormceptor unit) should still be sized for the 80% TSS removal. A combination of lower TSS removal devices does not "add up" to meet the MECP enhanced level water quality. A pretreatment device should be part of the treatment train but without pretreatment, the OGS unit will only be considered as operating at 50% efficiency as per the City of Guelph's Development Engineering Manual.</p>	<p>Please refer to the revised stormwater management design within the submission documents.</p>
16	<p><b>Geotechnical Report:</b></p> <p>3. The preliminary groundwater findings in the report suggest deep groundwater however this assessment should be evaluated using the recorded seasonal high groundwater levels yet to be provided. <b>Please update the geotechnical report with the spring freshet elevations.</b></p>	<p>Stantec is undertaking the Hydrogeology Study to verify the groundwater details. This study measured water levels this spring and the findings will be provided once analysed. The ultimate report will be provide once two Spring freshets are completed and the require analysis and reporting completed.</p>
17	<p><b>Source Water Protection:</b> Source Water Protection staff have no comments at this time but will require a Salt Management Plan to be included with the formal Site Plan submission.</p>	<p>Noted. A Salt Management Plan will be included with the Site Plan submission.</p>
18	<p><b>Environmental Engineering:</b> Please resubmit a Phase 1 ESA in accordance with O.Reg. 153/04 as amended. The provided Phase 1 ESA Update was written for property transaction purposes rather than O.Reg. 153/04 or RSC requirements. For further information please refer a document found on the City's website entitled "City of</p>	<p>The guideline states that either option is acceptable.</p>

	Guelph Guidelines for Development of Contaminated or Potentially Contaminated Sites 2016”	
19	<p>Noise Feasibility Study: The provided noise study has been reviewed and as attached to this email is a copy of the study with detailed comments found within the document. The comments can be summarized as follows:</p> <p>Class 4 is not intended as a form of mitigation. No other justification is presented in this report for considering the property as a Class 4. The original intent of Class 4 was to adapt to land use conflicts between out-going industrial land uses and new sensitive land uses; despite the wording provided (and/or lack of clarity) in NPC-300, the use of Class 4 with regards to commercial land uses are outside of the original intended use. Consider the other elements and requirements under Class 4, including the connection between the proposed Class 4 noise sensitive land use and the noise source's provincial approvals: does the "Willow West Mall" facility have existing ECA approvals? This was not outlined in the report and is not likely given the type of use. Once the Class 4 is applied, it remains in effect while the stationary source is present. How will that be defined in this case, as the stationary noise is from multiple leasehold uses? We consider this case to be outside the normal application of Class 4, though in general, we are not opposed to the consideration of this site as a Class 4, but additional dialogue and/or justification within the report will be necessary.</p>	See the Noise Study provided.
20	<p>Staff Recommendations: At this time, staff will be unable to support the application as submitted and recommend that the applicant review the comments with their consultants and revise the design and supporting documents for a subsequent resubmission. Engineering staff would be available to meet should there be any question relating to the above feedback.</p>	Noted.
<p><b>David de Groot, Senior Urban Designer 519-822-1260 ext. 2358</b>  <a href="mailto:David.deGroot@guelph.ca">David.deGroot@guelph.ca</a> February 4, 2022</p>		
21	<p>Urban Design staff understand that the applicant will be revising their application, which will</p>	

<p>include changing the location of buildings. In preparing this revised application, please address/respond to the following in all supporting drawings (Conceptual Site Plan, Master Plan, etc.) and studies (i.e. Urban Design Brief):</p> <p><b>Urban Design Brief Comments</b></p> <ul style="list-style-type: none"><li>• Section 3: Urban design directions should outline the key design moves (i.e. beyond lease lines). What is driving the urban design approach to redevelopment of this property?</li></ul>	<p>The “no build” areas within current leases are development constraints of the site, not urban design directions. Please refer to the Urban Design Brief.</p> <p>“6.3 Urban Design Goals and Objectives for the Site</p> <p>The urban design goals and objectives for the site include;</p> <ul style="list-style-type: none"><li>• Creating an enhanced design and placement of main floor commercial and common areas engaging the public street.</li><li>• Creating a pedestrian streetscape experience with the opportunity to provide opportunities for casual observation or “eyes on the street”.</li><li>• Incorporating design features to screen common amenity areas from road noise and parking areas.</li><li>• Reducing the predominance of the existing parking fields along the public realm.</li><li>• Providing private amenity areas that respond to the site context and the unit types proposed.</li><li>• Ensure that both indoor and outdoor Common Amenity Areas are provided and that they are accessible to each other.</li><li>• Provide walkway connections throughout the site to connect with</li></ul>
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		<p>municipal sidewalks and transit stops.</p> <ul style="list-style-type: none"> <li>• Locate the proposed buildings to ensure a sensitive transition to the adjacent low density areas.”</li> </ul>
22	<ul style="list-style-type: none"> <li>• Section 6.2.2: In regards to the City’s Urban Design Action Plan, please address the Intensification Corridor Directions and ensure you are referencing the updated document (see page 15): <a href="https://guelph.ca/wpcontent/uploads/Urban-Design-Manual-volume-2.pdf">https://guelph.ca/wpcontent/uploads/Urban-Design-Manual-volume-2.pdf</a></li> </ul>	The “Urban Design Manual Volume 2 Urban Design Action Plan City of Guelph November 2017” is included in the Urban Design Brief.
23	<ul style="list-style-type: none"> <li>• Section 6.5.3: Please provide summary of the compliance with the City sun/shadow criteria: <a href="https://guelph.ca/wp-content/uploads/Guelph-SunShadow-Study-Terms-of-Reference-19-05-27.pdf">https://guelph.ca/wp-content/uploads/Guelph-SunShadow-Study-Terms-of-Reference-19-05-27.pdf</a></li> </ul>	Petroff has provided the compliance analysis.
24	<ul style="list-style-type: none"> <li>• Please include a phasing plan/master plan – How does this project fit into the site’s evolution over the longer term (see section 9.5 of the Council approved Commercial Built Form Standards)? How did considerations around open space, common amenity, context, circulation, shadows, wind, grading, massing etc. inform this design? Please directly address section 9.5 and provide a Phasing Plan.</li> </ul>	<p>The proposed 2 phase master plan is provided with this submission.</p> <p>Please see the Urban Design Brief.</p>
25	<ul style="list-style-type: none"> <li>• Please address building length concerns especially as the buildings are over 75m in length. The Commercial Built Form Standards include a maximum building length of 75m where buildings are within 15m of a right-of-way.</li> </ul>	Please see the Urban Design Brief.
26	<p>Preliminary Comments on Revised Concept</p> <ul style="list-style-type: none"> <li>• Please look at options that comply with the angular planes, common amenity area, and 6m setbacks from Silvercreek and Willow.</li> </ul>	The revised proposal is in compliance with the 6 m setbacks from Silvercreek and Willow. The proposal is also in compliance with the required angular plane.
27	<ul style="list-style-type: none"> <li>• Please address concerns regarding building length (outlined above).</li> </ul>	Please see the Urban Design Brief.
28	<ul style="list-style-type: none"> <li>• Grading will be important in order to ensure the building entrances face and interface with the adjacent public streets.</li> </ul>	The site is relatively flat where the new building entrance is proposed.
29	<ul style="list-style-type: none"> <li>• Has the daylight triangle implications been considered in the placement of the buildings?</li> </ul>	Please see the revised concept plan.
30	<ul style="list-style-type: none"> <li>• The at-grade units are supported. Front patios for ground-floor residential units, where appropriate, should be raised to provide for</li> </ul>	Petroff has added details of these private amenity areas for ground-floor residential units.

	privacy and a transition between the public and private realms. We will be interested to see the details around this transition.	
31	• For the commercial unit, we will be expecting to see clear glazing facing the street (i.e. Silvercreek).	See the revised building elevations.
32	• Ensure to provide appropriate landscape buffer (3m) of parking from the street line.	Petroff has revised the plan to provide a 3m landscape buffer along the street line for phase 1.
33	• Please provide barrier-free pedestrian circulation around all sides of the building, as well as connections between at-grade Common Amenity space and public streets.	Preliminary grading is provided in this submission, understanding that a more detailed design will be undertaken during detailed design.
34	• Ensure to provide appropriate height clearances of the underground garage for residential accessible vehicle parking.	See the revised plans.
35	• Sustainable Site Design is strongly encouraged, such as LID measures, green roof systems and increased tree canopy cover.	See the Landscape Plan provided.
36	Please note that only conceptual illustrations of the revised application have been provided. Additional and more detailed urban design comments will be included as part of review of a formal revised application.	Noted.