

From: Elizabeth Snell
Sent: March 8, 2012 1:50 PM
To: Michelle Mercier
Subject: Envision Guelph

I am a board member of Transition Guelph <http://transitionguelph.org/>. A couple of years ago a large group of interested Transition Guelph members compiled their vision for Guelph in 2030. Given the 2031 timeline of Envision Guelph, I thought you might be interested in the summary page - please see attached - as a form of public input representing the approximately 50 people who participated in the exercise (Transition Guelph members/contacts number in the many hundreds).

I appreciated the chance to review the Envision Guelph material at City Hall this week. It seems to me that the general direction is toward the Transition Guelph vision.

Best wishes with the next steps.
Elizabeth Snell

Transition Guelph – Assembled Hopes for Guelph in 2030: DRAFT

In 2030, Guelph will be a community of dense, diverse, largely self-contained neighbourhoods connected by healthy natural corridors with clear, free-flowing streams. Everyone will live near community gardens and communal play areas. Rain runoff will approach natural rates, largely soaked up by green roofs, street trees, gardens and permeable street surfaces.

Vegetable gardens will be numerous, replacing lawns and sprouting in schoolyards. University lands will be operating farms. Fruit and nut trees will be widespread. Cold frames will be common. Some livestock and bee-keeping will be permitted. Bustling neighbourhood and central markets will be open daily. Permaculture methods will be popular; local food processing will proliferate.

Buildings – many attached - will be energy-self-sufficient and often energy-producing. Solar energy - passive, solar thermal, solar PV – will be extensively used along with highly effective insulation. Where appropriate, wind, water-power, ethanol and geo-thermal energy will be tapped and community energy sharing organized. Grey water systems will be routine. Affordable housing will be plentiful and big box stores will be transformed into community spaces.

Local business will flourish throughout the city, providing meaningful work for all. Many transactions will use local currency. The proximity of work and play will leave little need for distant travel. Regional and local public transit – rail and bus - will be integrated, affordable, convenient and renewably powered. Most people will walk and bike, enjoying a safe, extensive network of trails and streets. Cars will be few, very small, shared and powered renewably. Electric bikes and scooters will be numerous.

Schools will teach children and youth how to live sustainably, including urban farming and food preparation, ecology, community interdependence, creative thinking and self-fulfillment. Youth will be active in sports and interactive games as well as engaged in the community. Education will continue throughout life with mentoring, re-training to local sustainable occupations, and accessible libraries. Music, art, theatre and festivals will thrive.

Social interactions will flourish - driven by local provision of food, shelter and jobs, and by many cooperative ventures. Urban density, the slow pace and emphasis on walking will contribute. Everyone will know their neighbours. Generations will mix. TV viewing will shift to broad participation in cultural activities. Support will be available to any who need it. All will have input to community decisions.

Most people will be in excellent health because of good diet and exercise, clean air and water, low stress, a rich network of community connections, the healing effects of working with the land, and high levels of happiness. Health care will be easily available and include a wide range of providers.

Understanding our interconnectedness with others and with nature will be universal. Material use will be low and largely homespun or fairly traded; relationships and creativity will be prolific, nurtured by ideas from around the world. All activities will honour ecosystem integrity – in Guelph, in our watershed, in our bioregion and on our planet. Guelph will be resilient to the soaring cost of oil and will contribute no more than its fair share of the greenhouses gases that the planet can sustainably absorb.

Comments

envision GUELPH

Name:

John Ambrose

Address:

Great concepts - I'll look forward to seeing them implemented.

Community energy - great concept - integrate with Urban Forestry Plan + green roofs, new natural lighting systems, PV solar collectors on tall buildings, etc.

Trail systems - consider as transportation corridors as well as recreational.

Special features - e.g., permeable paving, grey water, etc. - need to find ways to go from concepts to implementation.

Urban Forestry Plan and Natural Heritage Plan - need to bring into force before more green space, special trees and green corridors are lost.

Submit your comments to:

OP Update
Planning Services
1 Carden Street, 3rd Floor
Guelph, ON N1H 3A1

Fax: 519.822.4632
email: OPUpdate@guelph.ca

From: Robert Mason
Sent: March 30, 2012 5:19 PM

Mayor Farbridge, Councillors & Planning Staff:

Re: Official Plan Update Phase 3 (OPA 48)
363-369 Gordon Street and 1 College Avenue

As noted in our correspondence of May 2010 (copy enclosed herein), we are the registered owners of the northwest commercial/residential corner at College & Gordon. We are pleased that the draft official plan has shown our two commercial properties as 'Neighbourhood Mixed Use Centre', but we object to staff not recommending the same being applied to our entire contiguous holdings at this corner, which includes 1 College Avenue immediately to the west.

The Old University CIP laid out several principals for redevelopment and envisioned an expansion of the corner to the north and west, which would include our property at 1 College Avenue. The CIP also recommended that this expanded designation should be linked to the Official Plan review. Accordingly, the draft OP should be specifically amended to reflect this designation. Redevelopment at this important gateway corner would not be feasible without the expansion of the 'Neighbourhood Mixed Use Centre' to our adjacent property.

In addition, it is critical to note that access to our commercial node is not in our ownership. At the present time, a lease has secured the two access points; however, there is no guarantee that this lease can be renewed in perpetuity. Without the two entry / egress points over the leased land to our site, the commercial node cannot survive, unless access is provided through our abutting property at 1 College Avenue. This is the appropriate time to ensure the continued viability of this long standing commercial node by extending the 'Neighbourhood Mixed Use Centre' designation onto this property too.

The attached sketch illustrates our ownership of the corner. The consolidation of our parcels, including 1 College Avenue under a single 'Neighbourhood Mixed Use Centre' designation will provide uninterrupted access to the site, and ensure the future viability of this site as intended by the CIP.

We would request that staff contact us to meet and discuss our issues in more detail.

Yours truly,

**NOSAM PROPERTIES LIMITED
& NASA HOLDINGS INC.**

Robert Mason

Robert Mason

From: "Robert Mason" <rmason@masonrealestate.ca>
To: <clerks@guelph.ca>
Cc: <greg.atkinson@guelph.ca>
Sent: Wednesday, May 12, 2010 2:15 PM
Subject: Comments on Official Plan Draft
Mayor Farbridge, Councillors and Planning Staff:

Further to our telephone and email discussions with Mr. Greg Atkinson, we are writing to comment on the draft official plan.

(a) We are the registered owners of the northwest commercial/residential corner at College & Gordon. We are pleased to note that the draft official plan has shown this area as 'neighbourhood mixed use centre'; however, we would like clarification that the boundary of this designation includes, our contiguous holdings at this corner (both 363-369 Gordon Street as well as our additional holding at 1 College Avenue, immediately to the west of the corner.) Furthermore, the Old University CIP recommended that the corner be expanded to the north and west and accordingly, the draft OP should be specifically amended to reflect this. Can you please confirm by return mail or by memo in the OP the inclusion of these two properties in the boundary of this 'neighbourhood mixed use centre' as well as the intent to expand the corner as directed in the CIP.

(b) Again with respect to the same property, we note that the draft OP contains provisions for road widening at this corner. We are strongly opposed to any such widening. Any widening on the west side of Gordon Street or the north side of College would cause a severe and permanent loss of value, use and functionality of this important small neighbourhood site. Furthermore, any widening would be at the expense of the existing sidewalk, making it dangerous for pedestrians. Any road widening contemplated at this corner must therefore be taken on the east side of Gordon or south side of College.

(c) There is a provision for road widening at Victoria approaching Eramosa Road and Eramosa approaching Victoria Road. We would respectfully submit that the city has just completed reconstruction at this intersection and that reference be made in the OP specifically excluding any contemplated road widening at this intersection, or alternatively be taken from the City park on the northwest corner.

Please give us written response to our queries herein. Thank you.

Yours truly,

Robert Mason

Mason Real Estate Limited
32 Douglas Street
Guelph, ON
N1H 2S9

(519)824-1811 phone
(519)824-1160 fax

GORDON

STREET



363-369 GORDON

LEASED
LAND

PARKING

OWNER: NOSAM PROPERTIES LIMITED

COLLEGE AVENUE

1 COLLEGE

OWNER: NASA HOLDINGS INC.

April 2, 2012

City of Guelph
City Hall, 1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Mayor Farbridge and Members of Council

Re: Envision Guelph – released January 30, 2012
Abode Varsity Living, 716 Gordon Street
Public Meeting April 2, 2012

Thank you for the opportunity to provide comments with respect to the Envision Guelph Official Plan Amendment No. 48. On behalf of our non-profit corporation, Mayfield Park Community Association, I can advise that we are in strong support of the proposed “Low Density Residential” designation proposed within the “Intensification Corridor” for the property located at 716 Gordon Street. This designation would permit a density of 35 units per hectare. This property is 1.7 hectares in area which would permit a total of 60 units to locate on this property. This is a Places to Grow density of 105 people per hectare assuming 3 people per unit. This exceeds the Places to Grow target of 50 people per hectare and is appropriate along the intensification corridor. A development proposal of 60 units would allow for the preservation of the heritage trees on the property, not overpower the Heritage designated house on the adjacent site, and meet the required zoning regulations (including parking) while still meeting intensification goals. Residential re-development of this property at this density would be transit supportive, encourage walkability and be compatible with the existing low-rise neighbourhood.

We commend the City staff regarding their preparation of Envision Guelph and encourage Council to support our neighbourhood and approve the “Low Density Residential” designation on 716 Gordon Street as proposed.

Thank you again for the opportunity to provide these comments.

Yours truly,

Kate MacDonald
President
Mayfield Park Community Association

cc: Todd Salter, City of Guelph

MPAC.doc

April 2, 2012

TO: Mayor Farbridge and Council Members

RE: Official Plan Update 48 Phase 3

Madame Mayor and Councillors:

RE: Envision Guelph – City of Guelph Proposed Draft Official Plan OPA 48

We have reviewed the proposed OPA 48 and have the following comments:

We do not believe that our original comments and concerns in our letter of May, 10, 2010 have been addressed by planning staff in "Attachment 5 "Policy Specific Comments received since April 2010." Pg. 44.

Therefore we are resubmitting our concerns and comments re the proposed medium density:

General Comments about increased density:

- Potential negative impacts of increased density on quality of life of existing residents
- Increased density must be compatible with and not negatively impact adjacent residents and our community as a whole
- OPA policies should support compatible development in existing neighbourhoods
- More density will further exacerbate existing traffic problems
- Residents cannot support higher density in Kortright Hills as no comprehensive traffic management plan has been conducted.
- Concern about economic impacts of growth and increased property taxes
- This is a Greenfield area so why medium density?

Proposed medium density on Niska Rd.

On April 9th 2010 a request was made to planning staff for further information with respect to the maximum number units that could be allowed on Niska related to the number of hectares to be re-designated to medium density residential. In other words how many 5 storey apartments could potentially be built if the lands were rezoned? To date we have not received this information. Without this information there is insufficient information to evaluate what impacts higher density will have on residents on Ptarmigan and the community as a whole. In this new OPA 42 Draft the height has been increased to allow 6 storey apartment buildings. We believe that this proposed new increase in height will may affect our views, shading and only serve to further exacerbate traffic problems on Niska Rd.

Residents along Niska Rd. are already negatively impacted by regional traffic from Highway 24. Niska RD. was originally designed to discourage regional traffic. Niska was not designed to be an arterial road. Without a comprehensive traffic management plan the re-designation of lands on Niska to medium density will further aggravate existing health and safety problems related to traffic and is therefore inappropriate.

The one lane Bailey bridge is a courtesy bridge with history of fatalities and accidents. A one way traffic light at this bridge could potentially alleviate some of the safety issues at this bridge. Members did not support the upgrading of the bridge to a 2 lane structure as this would only increase regional traffic. The current road grades and elevations are not safe for the existing volume of traffic especially in winter. The intersection of Niska and Downey meets the warrants for traffic lights but may not be permitted related to the location of Woodland Glen and the Hanlon.

The Niska Rd. Environmental Assessment is needed before any changes in density are approved.

Medium density on Niska does not appear to support the OP principles of a walk able, compact community as this proposal is on the fringe of the city and there are few services in this area.

Higher density may impact the ecological integrity of the adjacent Speed River PSW.

The proposed minimum density does not allow flexibility in future zoning proposals.

After a long and extensive OMB mediation process (PL 050323) all parties signed the revised documents including Minutes of Settlement and Planning Approval Documents. The OMB decision #3143 was final on November 8, 2006. As part of this decision OPA 26 was approved by the OMB. Therefore we would appreciate assurances from both City of

Guelph Planning and Legal staff that this proposed OPA 42 does not in any way alter or negatively impact the OPA 26 approved by the OMB. If there are alterations please advise us in writing of where these changes are proposed.

KHCA recognizes that our position may not represent the neighbourhood and membership as whole and individual members and residents still have the right to express their support, concerns and objections for the proposed OPA changes in writing or at meetings.

Respectfully submitted on behalf of KHCA Inc. by:

Laura Murr
President KHCA Inc.

From: judy martin
Sent: April 2, 2012 12:03 PM
To: Dolores Black
Subject: comments on OPA 48



April 2, 2012

Dear Mayor Farbridge and Councillors,

Sierra Club Canada provides the following comments with respect to Official Plan Amendment 48:

The Official Plan is a complex, lengthy, and technical document. The proposed amendment essentially rewrites much of it. In the interest of transparency it is important for Council and the public to be able to review the amendment and to understand how it relates to the current OP that guides the City.

To comprehend the official plan amendment as proposed, one needs to be a full-time professional with detailed knowledge of the current OP. This is a lot to ask of our councillors and far beyond the reach of most residents of Guelph.

To put the OP amendment into a context that can be thoughtfully considered, staff should be asked to provide a single document that 1) indicates with strikeouts the provisions in the current OP that are to be deleted 2) indicates with underlines or some other method the proposed changes/additions. It would also be helpful to have a companion document that explains the intent behind each major change.

Thank you for your consideration of these comments.

Judy Martin, Regional Representative

Submission to City Council April 2 2012

Regarding Official Plan Update Phase 3 (OPA 48)

Submitted by Hugh Whiteley

Requests

- (1) That the central focus on Guelph's rivers and river valleys as the "backbone" of Guelph's linked open space lands and a critical, integral component of Guelph's image be restored in the Official Plan.**
- (2) That the River System Management Plan be retained as a guide for the preparation of plans within river and tributary corridors.**
- (3) That the specific quantified protection for the comprehensively defined open space and environmental corridors along the rivers and tributaries be restored in the Official Plan. This includes retention of sections 3.6.18; 6.9.2 through 6.9.5; 7.3.11; and 7.3.15.**
- (4) That ravines be included in the Official plan listing of valued features to be safeguarded.**
- (5) That the Vision Statement for the Official Plan be rewritten as a guide to the long-term aims of the City.**
- (6) The background statement of the Official Plan should be rewritten to name the demographic and economic challenges to be overcome by the City.**

Explanation

Focus on river corridors

The current Official Plan gives high prominence to the Speed and Eramosa river valleys, and the tributary valleys in the city, as both the backbone of the city's linked open space system and as the vital linkage in the Natural Heritage System. The Official Plan incorporates the holistic approach of the River System Management Plan with a recognition of multi-faceted benefits and functions of the corridors. The Official Plan emphasizes naturalization of the riverland corridors as the preferred treatment subject to a feasibility criterion where intense development in the downtown area restricts this option.

The current draft of OPA 48 drastically reduces the emphasis on riverlands as an integral component of Guelph's image and character. The current OP references the Speed River at a frequency of 24 mentions per hundred pages of text. OPA 48 reduces the mention of

the Speed River to 4 mentions per hundred pages. River corridors have been diminished to a minor feature of Guelph.

Abandonment of the River System Management Plan and its quantitative protection

Guelph has two distinctive planning initiatives that set it apart from other Canadian cities. One is the River System Management Plan and the other the Community Energy Initiative. The current version of OPA 48 retains a strong emphasis on the Community Energy Initiative but abandons, without notice or justification, the River System Management Plan.

The RSMP is distinctive because it correctly identifies that only a holistic approach that incorporates the perspectives of natural heritage system, cultural heritage, open space values including important spiritual aspects, recreational aspects, and urban design can properly establish the value and importance of rivers and riverlands to a community. The approach in OPA 48 is to reduce the role of rivers and riverlands to the single dimension of a technically-defined natural heritage system and then further diminishes the protection afforded to river systems by emphasizing a legalistic approach that preferentially seeks to minimize the protection afforded to river and riverlands to the minimum requirements set by the Provincial Policy Statement.

The effect of this change in approach is evident in OPA 42. The result of the OPA42 process was to reduce the overall Natural Heritage System of the city of Guelph by 10 % compared to the NHS of the 2001 OP. The appeal process currently underway will create a further loss of NHS.

Without the support provided by the current OP for a proper comprehensive view of the protective requirements for river corridors, and the resulting minimum 30 metre setback or top of steep slope 15 metre setback provision as a minimum protected corridor, there are at least two valuable corridor elements that are likely to be lost. One is the mature forest on the east side of the Speed River that provides the dramatic backdrop to the Speed River at Riverside Park. The other is the lovely viewscape along the Eramosa River in the York Road Innovation District.

The River System Management Plan should be reaffirmed as the basic document guiding development in the river and tributary corridors and the specific quantitative requirements for protection of river corridors restored to the text of the Official Plan.

Protection Of Ravines

The current OP and OPA 48 both ignore the special places that wooded ravines are and the high value placed on them in Guelph. There are at least three ravines that warrant protection (Silvercreek ravine at Howit Park, Watson Creek Ravine, and the Maple

Street Ravine). The Official Plan should acknowledge the value of these features and provide the base for a Ravine By-law similar to the Toronto By-law.

Vision Statement

The vision statement in OPA 48 reads like a hypothesis to be used as a basis for technical evaluation of the implementation of the Official Plan.

Vision

The integration of energy, transportation and land use planning will make a difference in the environmental sustainability, cultural vibrancy, economic prosperity and social well-being of Guelph.

The vision statement of the Official Plan should be an inspiring and realistic encapsulation of the core values and intentions of the city. Other Official Plans, the OP for Oakville for example, are helpful examples.

I would suggest the following:

Guelph is a city that cares for all its citizens; a city progressing steadily toward a stable sustainable and perpetually-renewing equilibrium; an equilibrium that provides an innovative and prosperous economy, a rich and varied cultural enterprise, a built form that recognizes, and celebrates the lasting values of Guelph's built heritage, and a generous integrated greenland system of parkland, open spaces and natural areas that respects, protects and enhances Guelph's distinctive landscape of rivers, hills, ravines, forests, and meadows, and that nourishes the natural environment that sustains all life.

Realistic Background

The background to the Official Plan should include a brief summary of the demographic and economic trends that must be taken into account in the planning period. The Burlington Official Plan has an excellent presentation of this type of information. One example of the trends to be recognized is the advancing median age of the population. For example in the ten years from 2001 to 2011 the key age group in the workforce and in household formation (25 to 44) did not grow at all in Guelph. This is a major challenge in maintaining a prosperous and innovative community.

INDUSTRIAL EQUITIES GUELPH CORPORATION
55 Kelfield St.,
Toronto, ON M9W 5A3

February 29, 2012

Mr. Todd Salter
General Manager, Planning and Community Services
Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Re: **Envision Guelph – Released January 30, 2012**

Dear Mr. Salter:

I am the President of Industrial Equities Guelph Corporation, the owner of the Southgate Business Park which received Draft Plan approval from the City of Guelph in January 2009. There are approximately 120 acres of zoned and designated industrial land within the Southgate Business Park that I have been actively marketing since our acquisition in 2005. The City of Guelph must ensure that it is positioning itself through the proposed Official Plan policies to both retain and bring jobs and assessment to the City. The Official Plan should not introduce road blocks to attracting employers to expand or locate in the City of Guelph. The Southgate Business Park abuts, and has excellent access to the Hanlon Expressway, and is located within the greenfield area.

The Southgate Business Park is a well located business park which to date has attracted users primarily with the intention of constructing distribution warehouse facilities and as a result would never achieve the employment density criteria of 36 jobs per hectare as contemplated in the latest Envision Guelph document. In fact, the lands located along the Hanlon Expressway in the southerly portion of Guelph including the Southgate and Hanlon Creek Business Parks are ideal to accommodate large warehouse users as they are located with easy access to the Hanlon and 400 series highways. In the 7 years we have been marketing our property we have never had an inquiry or serious level of interest from any employer who would meet the 36 jobs per hectare target of the proposed Envision Guelph. Indeed the proposed facilities of Rona, and Target (who chose to go to Halton Hills) and others would not meet the density criteria of the Envision document. In addition, the existing TDL facility and the existing data centre do not meet this density target. Embedding unrealistic density targets within the Official Plan create a negative view of the distribution warehouse users who are interested in locating in Guelph. This leads to them not being viewed or treated as positive or desirable users by the City. There appears to be a disconnect between the market reality and the proposed policies of the Official Plan. The Official Plan should

encourage the distribution warehouse users which have formed the backbone of enquires to date.

The Official Plans that I have canvassed include the combined people and jobs density target as required by Places to Grow. These Official Plans do not create separate job only targets for employment areas. I suggest that Guelph remove any job specific targets from the Envision Guelph Plan and rely on the combined people and job density targets as stipulated by Places to Grow.

With respect to water supply, the City's water supply is groundwater based, therefore high water users are not encouraged to locate in the City. This is a constraint to food industries and many manufacturers looking to locate in Guelph which require water for their operations, notwithstanding their ability or inability to comply with the jobs criteria set out in the Envision document.

In summary, I have reviewed the proposed Official Plan and am providing the following comments.

1. Excerpt from Envision Guelph - "9.5 Employment Designations

f) To ensure higher employment densities are achieved in the greenfield area in order to contribute to the achievement of the minimum overall density target of 50 persons and jobs per hectare.

9.5.2.17. The City shall plan to achieve an average density of 36 jobs per hectare on lands designated Industrial in the greenfield area. "

9.5.2.18. Development with densities of 36 jobs per hectare or more are highly encouraged to locate within the greenfield area."

Comment – 36 jobs per hectare is an impossible target to meet for greenfield area employment lands. The job only target for employment designations should be removed from the Official Plan. (ie. delete the 36 jobs per hectare density target)

2. Excerpt from Envision Guelph – "9.5.1 General Policies

The following general policies apply to all Employment designations.

1. Industries which require high volumes of water use should demonstrate through a Water Conservation Efficiency Study that water consumption will be reduced through on-site processing or recycling.

2. The Zoning By-law may restrict industries which require high volumes of water use to protect service capacity needs of planned growth".

Comment – Industries requiring water for their operations are discouraged from locating in Guelph. Private wells are not permitted to supplement the day to day operations of industries wanting to locate in Guelph. This will reduce the interest of prospective employers in Guelph.

3. *Excerpt from Envision Guelph – “9.5.1.3. The pattern and design of streets and sidewalks should facilitate accessibility, walking, cycling and transit use and should be connected within and outside the employment areas.”*

Comment – The business parks in Guelph have been planned with bicycle lanes, and off-road multi-use trails. The transit service is provided by on-demand stops. Sidewalks are not a cost effective option for business parks and reference to sidewalks should be removed from this section of the Official Plan.

4. *Excerpt from Envision Guelph – “9.5.1.3.5. Where residual heat, energy or water is produced in an employment process, it is encouraged to be reused on site or off site in conjunction with other land uses or through existing or planned district energy systems.”*

Comment – wording should be added to this section “where is it shown to be cost effective.”

5. *Excerpt from Envision Guelph –“ 9.5.2 Industrial*

3. Warehousing and indoor bulk storage of goods will primarily be directed to locate on industrially designated lands within the built-up area where there is convenient access to the Hanlon Expressway or rail lines.”

Comment –The wording of this section of the Official Plan should be reworded to add reference to ‘greenfield areas.’ It is the designated greenfield areas with convenient access to the Hanlon Expressway which are best positioned to accommodate warehouse uses.

6. *Excerpt from Envision Guelph - Height and Density*

9.5.2.16. A minimum height of 2 storeys is encouraged.

Comment - Please clarify the wording of this section. Warehouses are typically 28 to 40 feet clear height but are only single storey except potentially the office portion which may be 2 storeys.

In closing, I would like to remind all stakeholders that the recent closing of the Electro-Motive plant in London Ontario, as well as other recent manufacturing plant closings in Southern Ontario serve as an indicator of the ongoing transition out of labor centric manufacturing facilities in Southern Ontario. Warehouse users should be embraced not discouraged. While they generally have large physical footprints, their carbon footprints are low relative to the labor intensive manufacturing industries and they pay their taxes in a timely fashion, a trait all municipalities should be embracing.

Please provide me with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to these proposed policies and our suggested wording changes.

Yours truly,



Mark Cowie, President
INDUSTRIAL EQUITIES GUELPH CORPORATION

(0544.Envision Guelph Comments February 2012.doc)

cc: Karen Farbridge – Mayor of Guelph
Members of Council – City of Guelph
Peter Cartwright – City of Guelph
Jim Mairs – City of Guelph
Astrid Clos – Astrid J. Clos, Planning Consultants
Leslie Marlowe – LM Real Estate Consulting



March 8, 2012

Sent by Email

Todd Salter
Acting General Manager, Planning Services
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Guelph N1H 3A1

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Dear Mr. Salter

Re: Comments on Envision Guelph (the “Proposed Plan”)

We represent Cooper Construction Limited (“Cooper”).

The purpose of this letter is twofold. First, we wish to set out the concerns of Cooper with the Proposed Plan. These same concerns have been expressed to Cooper by a number of other registered landowners on both the east and west sides of the Hanlon Expressway. We also wish to request a meeting with you to discuss these concerns. I have already left you voicemail and email messages requesting such a meeting.

Background

Cooper owns property in both the Hanlon Business Park South (the “Southgate Lands”) and the Hanlon Creek Business Park Phase 2 (the “Hanlon Lands”) (together the “Lands”). The Lands are zoned Industrial, which permits large scale warehousing and manufacturing uses. Moreover they have been, are in the process of, or are intended for development as such. In fact, Cooper has purchased land from, and entered into a number of development agreements, including a cost-sharing agreement, with, the City to facilitate this specific type of development.

The Lands are designated as “Greenfield Area” on Schedule 1, and as Corporate Business Park/Significant Natural Area/Industrial (Hanlon Lands) and Industrial (Southgate Lands) on Schedule 2, of the Proposed Plan.

Comments on the Proposed Plan

A. Issue: Location of Warehousing

Cooper is particularly concerned that Policy 9.5.2.3 of the Proposed Plan directs warehousing to industrial lands located in the built up area.

Marc Kemerer
416.593.2975
MKemerer@blaney.com

As a practical matter, it would make sense for the City to direct warehousing to the Lands given their close proximity to the Hanlon Expressway and Highway 401. Indeed, the City has entered into an agreement with the Province to construct the new Laird Road interchange for the purpose of allowing convenient access for trucks to the adjacent industrial areas. Such traffic primarily services large scale warehouse users.

As a contractual/planning matter, warehousing should be directed to the Lands as they were purchased/intended for just this purpose. The Hanlon Lands were purchased from the City and developed at significant cost with the City acting as both the approval authority and a development partner. The City has marketed their own lands in the Hanlon Creek Business Park for warehousing purposes and recently sold a parcel of this land to Wurth for a new warehouse facility. With respect to the Southgate Lands, the City recently approved site plans submitted by Cooper to construct large warehouses thereon.

As a matter of consistency/interpretation, Policy 9.5.2.3 contradicts Policy 9.5.2.4, which states that Southgate Lands will be characterized by “larger free standing industrial buildings” (i.e. warehouses), and Policies 9.5.2.12 and 9.5.3.9, which permit warehousing uses on the Lands. It is not clear how the City would interpret these conflicting policies in response to an application for a warehouse development on the Lands.

Solution: To ensure that there is no confusion over the location of such development, Policy 9.5.2.3 should be revised to direct warehousing to the Greenfield Area.

B. Issue: Employment Densities

The Proposed Plan would target/encourage/require the following minimum or average densities/ha within the greenfield area:

1. 50 persons and jobs (9.5(f));
2. 36 jobs on lands designated as Industrial (9.5.2.17) [the Southgate Lands];
3. 36 jobs or more (9.5.2.18); and
4. 70 jobs on lands designated as Corporate Business Park (9.5.3.17) [the Hanlon Lands]

Only Policy 9.5(f), an objective of 50 persons and jobs/ha, is authorised by the *Growth Plan* and the City’s own Growth Plan conformity exercise, OPA 39. The proposed additional employment density targets/requirements (the “Additional Densities”) are arbitrary and completely unrealistic. By way of example, the proposed development of Block 6 of the Hanlon Lands as a distribution facility for a national food services company, a development enthusiastically supported by the City, would not meet the Additional Densities.

Moreover, the range set out in the Additional Densities clouds the Proposed Plan with an internal inconsistency that will create significant confusion in terms of how the City would evaluate development proposals on the Lands. It is not clear what criteria would/should be used by staff.

This confusion is amplified by Implementation Policy 10.18(ii), which would allow the City to require, as part of any development application, a demonstration of how the proposed development “contributes to the achievement” of the intensification targets. We do not know how any developer could demonstrate this with certainty and what penalty, if any, there is, if such targets are not met by the development subsequent to its completion. In our view, the City has no jurisdiction to impose such a requirement.

Such uncertainty can only discourage the type of “robust” development and employment the City is seeking.

Further, the employment targets above run completely counter to the nature of development proposed for the Lands. As noted above, warehousing is permitted on the Lands under the existing zoning and the other Policies of the Proposed Plan. This use has been actively encouraged and approved by the City for location on the Lands. The Additional Densities approach visits a specific unfairness on Cooper.

Finally, it is our considered view that the Additional Densities offend the provisions of the *Growth Plan* and OPA 39. Where these latter planning instruments direct higher levels of density to the Built Up Area, the Proposed Plan directs facilities that have low job densities to that same designation (see for example Comment MM712 at Policy 9.5.2.3).

Solution: Delete Policies 9.5.2.17, 9.5.2.18, 9.5.3.17 and 10.18(ii).

C. Issue: Energy and Water Efficiency

Cooper supports the conservation and efficient use of water and energy. The approach of the Proposed Plan to these objectives however is counter-productive.

In terms of energy efficiency, Policy 4.7.3 singles out the Hanlon Lands as essentially one of only 4 areas that would be subject to a district energy system. This will have significant construction cost implications; at the outset Cooper and other builders will have to provide for future connections to a system that has not yet been designed, and in the future equipment may have to be replaced to make it compatible with the district energy system. At the very least, this will put Cooper at a competitive disadvantage and thus may hinder the development of the Hanlon Lands.

Regarding the conservation of water, Policies 9.5.1.1 and .2 are vague and create uncertainty. By way of example:

1. there is no set standard for a sufficient reduction in water consumption through on-site processing or recycling;

2. restrictions established under the Zoning By-law on industries that require high volumes of water would contradict the provisions of the Proposed Plan that permit those very uses. Such restrictions would also undermine the established principle of fairness in service allocation whereby permitted uses are allocated services on a first come first received basis. Moreover, the Hanlon Lands already are subject to a strict water recharge target, which will be easier to achieve through the use of a large roof area consistent with a large-scale distribution centre.

These Policies, no matter how well intentioned, will discourage industries requiring water from locating in Guelph and will be particularly punitive for developers in the Greenfield Areas.

Solution: Amend the Proposed Plan policies above to encourage efficiencies in energy and water consumption where cost-effective rather than prohibiting development on the basis of a vague requirement. Provide clear benchmarks for such efficiencies.

D. Issue: Urban Design

The Proposed Plan will require a high standard of urban design for the Lands, and particularly the Hanlon Lands given its “gateway” location. Cooper understands the importance of good design, but it is concerned that no specific urban design guidelines have been prepared as part of the Proposed Plan (see Policy 9.5.3.7). Cooper cannot understand what “design principles” are to guide development on the Lands. It may be that the design principles developed to support a “park or campus like setting” may not be compatible with a warehousing use.

Solution: Amend the Plan to include specific and transparent Urban Design Guidelines that reflect the nature of development permitted and can be easily understood.

E. Issue: Parking

A number of Policies in the Proposed Plan (8.12, 9.5.2.19, 9.5.3.18 and 9.5.3.19) require that surface parking be hidden, screened and/or minimized. These Policies may make sense when applied to a more developed urban setting, but they can make development in other areas, including the Lands, untenable given the cost of building parking structures.

Solution: Encourage parking structures where appropriate and not cost-prohibitive. Clarify that surface parking in Greenfield Areas will not be an impediment to development approvals.

F. Issue: Sidewalks and Height

Cooper adopts the position on these matters taken by Industrial Equities Guelph Corporation in its 29 February 2012 letter submitted to you (Comments 3 and 6).

Solution: Delete any reference to sidewalks in Policy 9.55.1.3 and set out the height in (12) metres in Policy 9.5.2.16.

Conclusion

We understand that the Policies of concern above are well-intentioned. Unfortunately, they render the Proposed Plan confusing and difficult to interpret. They also are often at odds with the very development supported by the City for the Lands. As a result, the Proposed Plan requires important revisions as set out above.

Request for Meeting

Further to my voicemail to you of 28 February 2012 and my email of 5 March 2012, we are requesting that you meet with us and representatives from Cooper to discuss Cooper's concerns with the Proposed Plan. As you know, time is of the essence. We would be grateful if you could provide us with times for such a meeting.

Yours very truly,

Blaney McMurtry LLP

A handwritten signature in black ink, appearing to be 'MK' or similar, with a horizontal line extending to the right and a short vertical line below it.

Marc Kemerer

MPK/mk

c. Client/M. Sear



EXPECT THE BEST

April 11, 2012

Sent by Email

Todd Salter
Acting General Manager, Planning Services
Guelph City Hall
1 Carden Street
Guelph N1H 3A1

2 Queen Street East
Suite 1500
Toronto, Canada M5C 3G5
416.593.1221 TEL
416.593.5437 FAX
www.blaney.com

Dear Mr. Salter

Re: Follow Up Comments on Envision Guelph (the “Proposed Plan”)

Thank you for meeting with us on 3 April 2012 to discuss the points set out in our letter of 8 March 2012 (the “Correspondence”) and for providing us with a copy of the Watson & Associates Report, “City of Guelph Employment Lands Strategy Phase 2” (the “Employment Report”).

On behalf of Cooper, we acknowledge, with thanks, your statement that the intent of the Proposed Plan is to allow for “business as usual”, so that the policies contained therein, as you put it, “will not be interpreted by the City in any way that would fundamentally question the existing use permissions”.

The purpose of this letter is to set out our full understanding of the results of the April 3rd discussion. The capitalised terms used in this letter have the same meaning as when used in the Correspondence.

A. Issue: Location of Warehousing

As you know, one of Cooper’s principal concerns is that Policy 9.5.2.3 of the Proposed Plan directs warehousing to industrial lands located in the built up area. We have requested, for the reasons set out in the meeting and the Correspondence, that the Policy be revised to direct warehousing to the Greenfield Area.

You indicated that you understood Cooper’s concerns and that the intent of the Policy is not to discourage the construction of warehousing/distribution centres on the Hanlon and Southgate Lands. This reassurance is helpful, but given that Cooper’s concerns remain, you committed to reviewing the Policy.

Marc Kemerer
416.593.2975
MKemerer@blaney.com

B. Issue: Employment Densities

The majority of the meeting time was taken up with a discussion on the Additional Densities. You advised that the Additional Densities were supported by the findings of the Employment Report.

With respect, we have carefully reviewed the Employment Report and can find no justification for the Additional Densities¹, particularly given that Report's findings that:

- the City enjoys “an adequate supply of designated employment lands to accommodate future demands on employment lands to 2031 and beyond” (p. ii);
- it is the “future designated employment lands”, and not the existing employment lands (in large part for the reasons set out below) that are critical to ensuring that the City meets its density strategy (p. iii). As we understand that this is the current position of staff, this should be made clear in the Proposed Plan;
- employment densities in the Hanlon Business Park average 31 employees per net ha (a long way away from the 70 jobs proposed) (p. 3-3 and 3-4);
- recent trends in industrial development in the City is toward low-density, space-expansive development (pp. 3-3 to 3.5);
- as evidence of this, recent industrial development has averaged 17 employees per net ha (p. 3-4)²;

For the above reasons and for the reasons set out in the Correspondence, we repeat our request that Policies 9.5.2.17, 9.5.2.18, 9.5.3.17 and 10.18(ii) be deleted.

C. Issue: Energy and Water Efficiency

In terms of energy efficiency, you emphasized that district energy is to developed only “where feasible”. On the issue of (waste)water conservation, you advised that the City will be including water (500 m³/day) and sanitary (330l/day/employee) standards in the Proposed Plan.

On the basis of the above, Cooper's concerns have been satisfactorily addressed.

D. Issue: Urban Design

You advised that a draft of the Urban Design Guidelines will be shared shortly with the industrial landowners, and certainly before the Proposed Plan goes before City Council for final approval. We look forward to receipt of same.

¹ We also cannot find any justification in the Employment Report for its own recommendation of 46 employees per net ha (p. 3-3).

² Given the Kintetsu World Express operations on Southgate Drive, this figure is more likely 14 jobs/ha.

E. Issue: Parking

You advised that the parking policies in the Proposed Plan are only “encouragement policies” (“should”). Accordingly, we understand that parking structures will not be required as a condition of development. If our understanding is not correct, please so advise.

F. Issue: Sidewalks and Height

In light of the concerns of both Cooper and the wider development industry, you committed to reviewing Policies 9.55.1.3 and 9.5.2.16.


Conclusion

We believe that we made considerable progress during the meeting in terms of addressing Cooper's concerns. Cooper continues to have concerns however that any development application, no matter how minor, would take it outside of the “business as usual” position and result in unreasonable or impractical demands on such development, particularly with respect to the unresolved issue of employment densities. As a result, we appreciate staff revisiting all of the policies still at issue.

Should you have any questions regarding the above please do not hesitate to contact me. We look forward to hearing the results of your review of our requests.

Yours very truly,

Blaney McMurtry LLP

A handwritten signature in black ink, appearing to read 'MK', with a long horizontal stroke extending to the right.

Marc Kemerer

MPK/mk

c. Client/M. Sear/A. Clos



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March 5th, 2012

File No.: 10080.95

City of Guelph
City Hall, 1 Carden Street
Guelph, Ontario
N1H 3A1

Attn: Melissa Aldunate, Senior Policy Planner

**Re: Envision Guelph – Official Plan Update Phase 3
Official Plan Amendment No. 48
Abode Varsity Living, 716 Gordon Street**

We act for Abode Varsity Living on land use planning matters with respect to the above-noted property. Official Plan and Zoning By-law Amendment applications were submitted to the City of Guelph in August of 2010 (and considered complete on November 30, 2010) to permit the development of two purpose-built student apartment buildings ("the Proposed Development"). The amendments were submitted under the existing City of Guelph Official Plan (2006), as amended by OPA 39, and Zoning By-law. These applications were appealed to the Ontario Municipal Board on December 13th, 2011 and the first pre-hearing conference is scheduled for April 19th, 2012 (PL111340). These applications are to be evaluated against in-force official plan policies. Notwithstanding this, Abode has requested GSP Group Inc. to monitor and provide input on the comprehensive review of your draft Official Plan.

The subject property is identified as an "Intensification Corridor" on Schedule 1 (Growth Plan Elements) and is designated "General Residential" on Schedule 2 (Land Use Schedule) to the existing Official Plan (2006). The General Residential designation permits a maximum density of 100 units per hectare and there are no building height limitations.

In the first draft of the Comprehensive Official Plan Update, released in May of 2010, the subject property continued to be in an "Intensification Corridor" and designated as "General Residential". The draft policies continued to permit a maximum density of 100 units per hectare.

The second draft of the Comprehensive Official Plan Update, released on January 30, 2012, however, is proposing to change the designation of the subject property. While the subject property continues to form part of an "Intensification Corridor", the Land Use Schedule on the second draft Official Plan illustrates the property as being designated "Low Density Residential". This "down-designation" of the subject property is directly conflicting with the existing policies that specifically encourage intensification on this property. This new policy direction is also inconsistent with the Provincial Policy Statement and the Growth Plan. The impact of the proposed down-designation is that the permitted maximum density is reduced from 100 units per hectare to 35 units per hectare. Given the property's superior location attributes it is difficult to rationalize this proposed down-designation.

While the draft OPA provides the potential for density bonusing up to 100 units per hectare within the Low Density Residential designation, the property owner must demonstrate and receive approval to use the bonusing. This does not represent good planning. The property is deserving of much more height and density than the January 2012 draft OP suggests and the owner should not be required to provide "bonusing" in order to permit a density on the property that is permitted as-of-right in the current OP.


In effect, the proposed designation and associated policies have decreased the as-of-right permitted density. Our client is opposed to the proposed designation of the subject property as it directly conflicts with the Provincial Policy Statement, the Growth Plan for the Greater Golden Horseshoe and Official Plan Amendment 39 (Growth Plan Conformity).

The proposed purpose-built student apartment buildings provides for intensification and redevelopment on a strategically located parcel in close proximity to the University of Guelph. Further, the development will provide for a more efficient use of land, along two arterial roads with transit service.

We would also request that GSP Group Inc. (c/o Chris Pidgeon) and Kagan Shastri LLP (c/o Ira Kagan) be added to the circulation list for all future information related to OPA 48. Should you have any questions in the meantime, do not hesitate to contact me.

Yours very truly,

GSP Group Inc.



Chris Pidgeon, MCIP, RPP
Principal

cc Abode Varsity Living
Ira Kagan, Kagan Shastri LLP (ikagan@ksllp.ca, 188 Avenue Road, Toronto, Ontario,
M5R 2J1)

March 23, 2012

City of Guelph

1 Carden Street, 3rd Floor

Guelph, On N1H 3A1

Email: OPUpdate@guelph.ca

Attention: Ms. Melissa Aldunate, Senior Policy Planner

Cc: Mr. Todd Salter, General Manager, Planning and Community Services

Dear Ms. Aldunate;

A Few weeks ago I attended a public open house at City Hall to review and comment on the City's Official Plan review (OPA 48) presentation, with City staff on hand for questions.

Pursuant to your guidelines provided at the public open house I would like to request this letter be recorded and duly submitted to council in advance of their OPA 48 Public Meeting of Council scheduled for April 2, 2012 as my opinions and input from both myself a resident of Guelph and, as a commercial Real Estate Broker For Colliers International.

I am a long time proud resident of Guelph. As an established commercial real estate broker in this area I have been aggressive in promoting Guelph as a business and residential destination directly for over 22 years. I have been proud to have been successful in bringing to Guelph; people, major businesses, development, and very qualified long term quality stakeholders who through my encouragement have invested heavily in Guelph's future. Among my clients are and have been some of this City's largest employers as well as presently active major developer clients.

The foregoing preamble is significant to the following comments as with Guelph, compared to other municipalities, being a resident I am well experienced in also responding to the "Guelph Stigma". Most developers and commercial interests I have approached over the years have heard stories about how hard it is to do business in Guelph and many soon discover that there is a sense of "once they got you here "they nail you at every turn"! They is "the City" and how I suggest staff ultimately interpret and apply policies they believe to be clearly the will of Council. It just seems to result in a perpetual off balance but inbred mentality that one can observe surfacing in one form or another sooner or later.

What it does for sure, is leave those (businesses) that experience it with their own sense of need and responsibility to flag a distinct caution to others they know who may be considering to risk Guelph as a place to bring their businesses.

First Gulf (as in downtown Waterloo core redevelopment) is an example of a developer who I observed felt they would not risk the time to try development in Guelph. The document in the OPA 48, in my

opinion has several proposals that such esteemed potential Guelph business players and industry would have cause to be concerned with.

I have tried to review the OPA 48 documents with an eye both as a Guelphite interested in Guelph's plans and as a Guelphite who also keeps trying to entice business and investment to come to my City. I have also requested and received feedback from my clients which I share with you in the context of this letter .

I hope there are others who will ferret out constructive criticism of the OPA and I hope you will accept it as that and have the wisdom to change where experience and genuine valid input recommends .

In discussing one aspect I had a concern with, with one of our young Planners at the earlier City Hall Public Open House, I challenged him to explain for example; Why the OPA would propose such an unreasonable and specific employment density of 36 jobs per hectare for industrial lands! He didn't seem to understand why this would be a problem and referenced it as a requirement to the Places to Grow Legislation with staff having to allocate density as they see fair from that provided under the act. I don't see that as being the intended application in the legislation nor does the application make good sense.

I also understood from him that this density is intended to automatically attract industry who would then have to meet that requirement thus creating more employment for Guelph. For South Guelph instance it doesn't work that way. South Guelph's advantage is location to the 401 and the ease with which to access that. This clearly translates, and has over the years, to warehouse, distribution and logistics/related based companies.

For me it seemed obvious here was one small but ultimately critical example of the imbedded thinking the City, at its core may even be unwittingly nurturing. One that feeds the very stigma of the "not interested in doing business in Guelph reputation we have all been fighting for so many years. It is a good example of an issue that will clearly translate into lost business.

This is a valid opportunity to initiate a few small tweaks to change to this effect. Shouldn't we be looking for what other "standards" (instead of target) gets cemented into policy and not only puts staff in a position of no room to provide reasonable flexibility but continues to feed our reputation because "we just don't get it"!

There has to be other portions of the proposed changes that likely should be carefully reviewed as to the real impact of how they are worded and I have discussed that logic but in experience I would suggest some of the following must be modified;

- the issue of water usage (in its worded form) is an obstacle to attracting industry;

- the board based reference to pattern and design of streets etc. facilitating bicycle lanes trails etc. press for costly sidewalks when trails and the like are already incorporated into development requirements;

-height of buildings is vaguely referenced as suggesting they should be a minimum of two storeys but in reality most new industrial buildings run from 24 feet to 40+ feet inside (height)

-directing warehousing and indoor bulk storage of goods to locate on industrially located designated lands within built up areas and rail lines", unless you allow Greenfield areas as part of this segment you eliminate the very areas that are already proven to attract that type of interest and; they generate effective revenue for the City.

-It is important to provide an element of reasonability to a business. Where it is shown to a business not to be cost effective to be in Guelph they will back away. Having wording that imposes a business to reuse its residual heat energy or water from its employment process has to be qualified as provided it is cost effective for the business.

The City of Guelph is known for inviting dialogue from it's citizens and as one I appreciate that I can do that. I am however also suggesting that in as much as every citizen has a right to be heard this document requires an element of strong leadership that demonstrates the wisdom to do what is best for the City. In fact the changes suggest in this letter will have no long term negative impact to the citizens rather it would enhance the ability for the City to ensure our citizens don't lose valuable business tax revenue and jobs.

The opportunity to purge and refine a document in relatively small ways as suggested will translate into important incentives to business we need.

I think what may also be available at this time is the opportunity to assess wording that doesn't fence an honest and diligent staffer into a corner whereby he/she has no choice but to apply rigid and seemingly unrealistic and uncooperative policies without the reasonable discretion to work with business or investors who would otherwise be prepared to be part of the revenue stream to our City.

Thank you kindly for the opportunity to make my thoughts known and I truly hope that council accepts these comments with respect and in the hopes that they will make a difference.

Respectfully yours,

Blake Mills, Vice President/Sales

Representative/ Industrial/ Commercial/ Land Group



March 27, 2012

Project No. 1206

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Todd Salter, General Manager, Planning and Community Services

Re: **Envision Guelph – Released January 30, 2012**
Springfield Golf Course, 2054 Gordon Street

I am the planning consultant for the owner of the Springfield Golf and County Club. This property is approximately 40 hectares in area. The current use is an 18 hole golf course including a club house, banquet facilities, restaurant, pro shop and associated parking area. The property is serviced by individual private services. The pro shop is housed in the existing stone farm house. These uses were established in 1989 when the property was located in the Township of Puslinch. The property was annexed into the City of Guelph in 1993. The subject property is included within the Hanlon Creek Watershed Plan which was completed in 1993 then incorporated into the current Official Plan.

The Springfield Golf and Country Club is operated as a fully certified Audubon Society golf course practicing sound environmental management and stewardship.

Current Official Plan

The current City of Guelph Official Plan (November 2006 Consolidation) Schedule 1 – LAND USE PLAN designates this property as Open Space, Core Greenland and Non-Core Greenland Overlay. The existing Open Space designation (section 7.12) permits private recreational uses, golf courses, restaurants, club houses, pro shops, public halls, other accessory buildings and uses that are normally associated with the main recreational use.

Schedule 3 - AREAS OF POTENTIAL ARCHAEOLOGICAL RESOURCES identifies the property as an area of archaeological potential. However, the site has been entirely disturbed during the grading required to create the golf course and associated buildings. The golf course property should be removed from the area identified as having archaeological potential on this basis.

Schedule 4 – STAGING OF DEVELOPMENT includes the subject property in the Stage 2 area. Also included in the Stage 2 lands is the Hanlon Creek Business Park which is now being developed. The portions of the Stage 2 lands along the Hanlon Expressway are also being developed as the Southgate Business Park.

“4.2.2 b) STAGE 2

Priority for the extension of municipal trunk services to support new urban development shall be given to those lands designated as Stage 2 servicing areas.
Development proposals in Stage 2 areas will be considered as services become available to the various parcels, and Council indicates that the City is prepared to provide the required trunk services. The implementing Zoning By-law, and its associated amendment process, may be used as a regulatory mechanism to prevent pre-mature zoning of land for activities that do not have adequate municipal services associated with them.”

Schedule 4B - SOUTH GUELPH SECONDARY PLAN AREA PHASING OF DEVELOPMENT includes the subject property in the Phase 3 area.

“4.2.5.6 Phase 3

Prior to development occurring in areas shown as Phase 3 on Schedule 4B, the following must occur:

- a) *Extension of the trunk sanitary sewer from the intersection of Clair Road and Gordon Street, southerly along Gordon Street. The primary constraint in servicing this area is topography, and the associated depth of cover on the sewer.*
- b) *Extension of the new water pressure zone (as referenced in Phase 2) is required before development can proceed in this area.”*

The City has completed the Environmental Assessment required for the extension of services along Gordon Street abutting the frontage of the subject property. The reconstruction of Gordon Street is scheduled for 2020 based on the current 10 year Capital Budget

South Guelph Secondary Plan (OPA No. 2)

Official Plan Amendment No. 2 is the South Guelph Secondary Plan approved by the Minister August 17, 1998. The purpose of this document as stated in OPA No. 2 is,

“The purpose of this Secondary Plan is to introduce new planning policies for southern areas that were annexed by the City from the Township of Puslinch in 1993.”

The final report with respect to the annexation dated 1990-91, “*recommended the annexation of approximately 4,300 acres of land from the Township of Puslinch and the Township of Guelph to the City of Guelph to accommodate the long-term growth of the City for a 20 year period.*” Based on the calculations used by the City to justify the annexation of the Clair-Maltby lands in 1993, the Clair-Maltby lands were needed to accommodate development that would occur by 2011.

OPA No. 39 Local Growth Plan

Schedule 1B – GROWTH PLAN ELEMENTS of OPA No. 39 designates the subject property as “Greenfield Area” with a minimum target density of 50 residents and jobs per hectare.

“2.4.4.1 The City will meet the forecasted growth within the settlement area through:

- c) planning for a **minimum density of 50 residents and jobs per hectare in the greenfield area.**”*

Existing Township of Puslinch Zoning

The subject property was included in land annexed into the City in 1993. The Township of Puslinch Zoning is retained on the subject property. The property is in the C4-2 Zone which permits a golf course, restaurant, club house and a single dwelling unit.

Envision Guelph (Released January 30, 2012)

I have reviewed the proposed Draft Official Plan and am providing the following comments with respect to the subject property.

Draft Schedule 2: Land Use Plan, proposes to designate the subject property as “Open Space and Park” and Significant Natural Area (currently under appeal). A new boundary has been included on this schedule delineating a “Secondary Planning Area” which now includes the subject property.

Section 9.7.2 states the following regarding the “Open Space and Parks” designation:

*“9.7.2 Where lands designated Open Space and Parks are in **private ownership** and a **development application is made requesting a change to a land use** other than Open Space and Parks, due consideration shall be given by Council to the following:*

- i) **Council will consider the acquisition of the subject lands, having regard for the following:***

- a. *the provision of adequate open space, parks and recreational areas, particularly in the vicinity of the subject lands;*
- b. *the existence of cultural heritage resources or natural heritage features on the site;*
- c. *the recreational service that is provided by the existing use and the benefits and costs accruing to the City through the public acquisition of the property;*
- d. *the possibility of any other government agency purchasing or sharing in the purchase of the subject lands; and*
- e. *the ability of the City to purchase the lands and the priority of the lands in relation to the City's overall open space and parks acquisition plan."*

Section 9.7.2 should not apply to the subject property which is private property and not open to the general public as a park. There should be a special policy for the subject property added to section 9.7 which states that,

"The Springfield Golf and Country Club is privately owned land. The current golf course use is intended as an interim land use. The conversion of the property to a residential use is anticipated to efficiently use what will be serviced land within the urban area and assist the City in meeting the Places to Grow Greenfield Area density targets. Section 9.7.2 does not apply to this property."

Alternatively, the Schedule 2 – LAND USE PLAN should designate the subject property as "Low Density Greenfield Residential" which is the same land use designation that the City has applied to the Victoria West Golf Course in the Draft Official Plan.

Draft Schedule 6 – STAGING OF DEVELOPMENT, proposes a dramatic change in comparison with the current Official Plan. The subject property is within Stage 2 under the current Official Plan, which is the same staging as the Guelph Innovation District (York District Lands) and the Hanlon Creek Business Park. Whereas the draft Official Plan is proposing a significant change in the timing from Stage 2 to Stage 4 for the subject property. The Clair-Maltby lands should be included in Stage 3 on Schedule 6 and it should be a priority for the City to initiate and complete a Secondary Plan for this area.

Section 9.10 of the Draft Official Plan states that the "*Clair–Maltby lands may be required for future urban development **beyond the year 2031***." These lands were annexed in 1993 by the City from the Township of Puslinch on the basis that there was a need for these lands **by 2011**. The Clair–Maltby lands should be a priority for the City to expedite for development. These lands should be included in the Places to Grow targets to 2031.

Draft Schedule 8 – TRAIL NETWORK shows a City trail bisecting the subject property which is private property. The proposed City trail should be moved to the east to follow

the natural heritage features identified on the property. This is a more appropriate location for the proposed City trail and is similar to other City trail locations both existing and proposed.

Please provide me with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to these proposed policies and our suggested wording changes.

Yours truly,

A handwritten signature in blue ink, appearing to read 'AClos', is positioned above the printed name.

Astrid Clos, RPP, MCIP

cc: Mayor Farbridge and Members of Council
Tom Krizsan, Springfield Golf and Country Club

(1206.Springfield Golf Club.doc)



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March 30, 2012

Project No. 8095

City of Guelph
1 Carden Street
Guelph, ON N1H 3A1

Attn: Mr. Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update, Phase 3
Official Plan Amendment No. 48
Estate of Valeriote 1968 Trust
1968-1992 Gordon Street, Guelph**

We act for the Estate of Valeriote 1968 Trust on land use planning matters with respect to the above-noted properties (the "Site"). The Site is located on the east side of Gordon Street, south of Clair Road. The Site is immediately north of the Springfield Golf and Country Club property. The Site contains two existing homes which access off of Gordon Street. The Site is comprised of two properties totaling approximately 80 acres.

The Site is currently subject of an appeal to the Ontario Municipal Board with respect to Official Plan Amendment 42 ("OPA 42").

We have reviewed the latest draft Official Plan ("2012 Draft OP") dated January 30, 2012 on behalf of our client and offer the following comments:

Loss of Residential Land

The Site is designated "General Residential" and "Core Greenlands" within the existing Official Plan ("OP"). In fact, we would estimate more than half the property is designated General Residential, with small pockets of isolated Core Greenlands. In complete contrast to the existing OP, the 2012 Draft OP designates the majority of the Site as "Significant Natural Area" (currently under appeal) and only a few pockets are designated "Low Density Residential".

Inclusion within Secondary Planning Area

The land use direction for the Site and the larger area was established under the South Guelph Secondary Plan ("SGSP") completed in August 1996. In terms of the Site, the Land Use Plan (Schedule A) contained in the SGSP reflects the designations on Schedule A in the existing OP. The previous April 2010 Draft OP update ("2010 Draft OP") had the Site within a "Special Study Area" designation, rather than a residential designation. The Special Study Area designation in the 2010 Draft OP (Section 8.14.2.2 – Clair and Maltby Special Study Area) placed the Site within the longer term urban supply and required a Secondary Plan to be completed to guide land use and phasing of

development. Similarly, the 2012 Draft OP includes the Site and much of the land between Clair Road and Maltby Road as part of a Secondary Planning Area.

While SGSP and existing OP indicated the need for extension of the sanitary sewer and improvements to the water pressure zone, there has never been a requirement for the Site to be within a secondary plan area or for the Site to be part of a longer term urban land supply. Based on our review of the 2012 Draft OP, this appears to be a major policy shift and impacts on the policy permissions currently afforded to the Site.

Greenfield Area, Residential Density and Proposed Designation

The Site is within the "Greenfield Area" noted on Schedule 1: Growth Plan. The Greenfield Area is planned to achieve an overall minimum density target of 50 persons and jobs per hectare. The General Residential designation in the existing OP permits up to 100 units per hectare. The proposed "Low Density Greenfield Residential" designation (Section 9.3.3) in the 2012 Draft OP only permits a maximum 60 units per hectare.

Given a large portion of the area between Clair Road and Maltby Road is part of the Greenfield Area, in our opinion the proposed designation of Low Density Greenfield Residential does not encourage the wise and efficient use of the Site in order to assist in achieving those targets.

In addition, given the difference in maximum density between the General Residential (existing OP) and Low Density Greenfield Residential (2012 Draft OP), it appears a down-designation has occurred. Accordingly, the Medium Residential designation (which allows up to 100 units per hectare) may be more appropriate for developable portions of the Site and aligns with the density permissions under the existing General Residential policies.

Proposed City Trail

Finally, we note a Proposed City Trail is shown on the Site as illustrated on Schedule 8: Proposed Trail Network. While in principle we do not object to trail connection through the Site, we would appreciate flexibility on the alignment of the trail system through the future planning approvals.

We note that Section 7.3.1.6 states that, "Amendments to the Trail Network as illustrated on Schedule 8 will not be required for route revisions provided that the continuity of the network can be maintained." Notwithstanding it appears there is flexibility for alignment of the trail, we note proposed trail alignment essentially bisects the property in an east-west direction and directly impacts on the developable portions of the Site, including the front residential area off of Gordon Street.

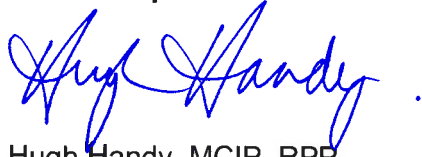
Summary and Future Notification

Thank you for considering our comments. We would be happy to discuss this matter further with City staff at their convenience and would appreciate a formal response to our letter.

We would appreciate formal notification of any future meeting of Council related to this matter and notification of adoption of OPA 48.

Yours very truly,

GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Associate, Planner

cc Gene Valeriote (on behalf of the Estate of Valeriote 1968 Trust)
 John Valeriote/Rob Mullin, SmithValeriote LLP
 Melissa Aldunate, City of Guelph



SHAPING GREAT COMMUNITIES

PLANNERS
URBAN DESIGNERS
LANDSCAPE ARCHITECTS

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March 30th, 2012

File No.: 10080.95

City of Guelph
City Hall, 1 Carden Street
Guelph, Ontario
N1H 3A1

Attn: Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update Phase 3
Official Plan Amendment No. 48
1291 Gordon Street - 2274237 Ontario Inc.**

We act for 2274237 Ontario Inc. on land use planning matters with respect to 1291 Gordon Street (the "Site"). 2274237 Ontario Inc. has requested that GSP Group Inc. monitor and provide input on the City of Guelph's draft Official Plan (Envision Guelph).

The Site is designated as "General Residential" in the existing 2006 Official Plan. The General Residential designation permits a maximum of 100 units per hectare and does not include any policies on permitted height.

A Zoning By-law Amendment was approved on August 3rd, 2010 to permit multi-residential uses on a 1.61 hectare portion of the Site (R4.A-37-H). The approved zoning permits a maximum density of 100 units per hectare and a maximum height of 7 storeys.

The draft Official Plan (January 30, 2012) proposes that the Site be designated as "Medium Density Residential" and that a maximum density of 100 units per hectare apply. However, the draft Official Plan now includes a height restriction of six (6) storeys.

The intent of this letter is to ensure that City staff are aware that the Site has site-specific zoning that allows for a height of 7 storeys.

With respect to the schedules, based on our review, there appears to be a mapping error in the vicinity of the Subject Properties. Schedule 2 (Land Use Plan) illustrates a small triangular piece as "General Residential"; however this triangle does not reflect any property boundaries and is bordered by land that is designated "Medium Density Residential" and "Neighbourhood Commercial Centre".

We would request that GSP Group Inc. (c/o Hugh Handy) be added to the circulation list for all future information related to OPA 48. Should you have any questions in the meantime, do not hesitate to contact me.

Yours very truly,

GSP Group Inc.

A handwritten signature in blue ink that reads "Hugh Handy". The signature is fluid and cursive, with a period at the end.

Hugh Handy, MCIP, RPP
Associate, Planner

cc 2274237 Ontario Inc.
Melissa Aldunate, Senior Policy Planner



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March 30th, 2012

City of Guelph
City Hall, 1 Carden Street
Guelph, Ontario N1H 3A1

Attn: Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update Phase 3
Official Plan Amendment No. 48
2274237 Ontario Inc.**

We act for 2274237 Ontario Inc. on land use planning matters. 2274237 Ontario Inc. has requested that GSP Group Inc. monitor and provide input on the City of Guelph's draft Official Plan (Envision Guelph) as it relates to land located on the west side of Gordon Street, between Arkell Road and Vaughan Street (herein referred to as the "Subject Properties"). The Subject Properties consist of five (5) separate land holdings.

The Subject Properties are designated as "Neighbourhood Commercial Centre" and "Medium Density Residential" in the draft Official Plan (January 30, 2012). Within the Neighbourhood Commercial Centre policies, Section 9.4.4.3 states that:

This Plan intends that a Neighbourhood Commercial Centre shall not be extended or enlarged to provide more than 4,650 square m (50,000 square feet) of gross floor area.

Section 9.4.4.12 (Permitted Uses) states that "medium density multiple unit residential within mixed-use buildings" are permitted within Neighbourhood Commercial Centres.

Based on our review of the policies for the Neighbourhood Commercial Centre it is unclear what the minimum and maximum permitted densities for the Subject Properties. Specifically:

1. There are three blocks of Neighbourhood Commercial Centre land in the vicinity of the Arkell Road and Gordon Street intersection. Is the maximum gross floor area, provided in Section 9.4.4.3, for the entire Neighbourhood Commercial Centre area, for each "block" or for each individual property?

2. If the maximum gross floor area is intended for the entire Neighbourhood Commercial Centre, how will the permitted density be distributed amongst the individual properties?
3. The minimum and maximum residential densities permitted are unclear. Is it assumed that because "medium density residential" uses are permitted, the permitted densities in the "Medium Density Residential" designation apply (i.e. maximum of 100 units per hectare)?
4. It is unclear in the policies if the maximum permitted gross floor area of 50,000 square feet includes residential uses. Is the gross floor area cap only for the commercial, retail and service uses, small-scale offices and community services and facilities uses?

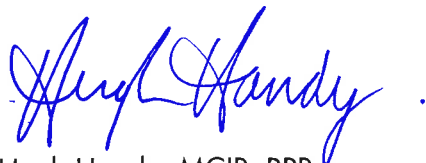
Section 9.4.4.15 limits the permitted height to six (6) storeys. As the land to the immediate north is permitted a maximum of 7 storeys, we would question why a lower height limitation has been placed on the Subject Properties.

With respect to the schedules, based on our review, there appears to be a mapping error in the vicinity of the Subject Properties. Schedule 2 (Land Use Plan) illustrates a small triangular piece as "General Residential"; however this triangle does not reflect any property boundaries and is bordered by land that is designated "Medium Density Residential" and "Neighbourhood Commercial Centre".

At your convenience, we would appreciate a response to the above-noted questions. We would also request that GSP Group Inc. (c/o Hugh Handy) be added to the circulation list for all future information related to OPA 48. Should you have any questions in the meantime, do not hesitate to contact me.

Yours very truly,

GSP Group Inc.



Hugh Handy, MCIP, RPP
Associate, Planner

cc 2274237 Ontario Inc.
Melissa Aldunate, Senior Policy Planner



March 30, 2012

Project No. 12030

City of Guelph
1 Carden Street
Guelph, ON N1H 3A1

Attn: Mr. Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update, Phase 3
Official Plan Amendment No. 48
331 Clair Road – Acorn Developments**

PLANNERS
URBAN DESIGNERS
LANDSCAPE ARCHITECTS

We act for Acorn Developments on land use planning matters with respect to the above-noted property. The property is approximately 4 acres in size and contains an existing home, barn and two sheds. The property is located on the south side of Clair Road near the intersection of Tolton Drive.

The site is designated "Reserve Lands" in the existing Official Plan ("OP") as illustrated on Schedule 2. Section 7.16.3 of the OP provides consideration for new land use development based on the adoption of an Official Plan Amendment in conformity with the South Guelph Secondary Plan (SGSP) Area Map. The property is shown as "General Residential" and within the "Urban Reserve" area on the SGSP Area Land Use Plan. We would also note that the property is located within the "Built-Up Area" as illustrated on Schedule 1 (as the developed urban area existed on June 16, 2006) and in accordance with OPA 39 (Conformity with the Planning Framework of the Growth Plan for the Greater Golden Horseshoe) a minimum of 40% of the City's annual residential development must occur in this area.

Section 7.16.3 of the existing OP provides consideration for an Official Plan amendment provided specific criteria are satisfied. GSP Group has had ongoing discussions in recent months with City staff and have now submitted a formal pre-consultation request to consider a residential development proposal for the above-noted property.

Based on our review of the draft Official Plan ("Draft OP"), Section 9.10 (Reserve Lands policies) the property and surrounding area now required to complete a Secondary Plan before future redevelopment could be considered. This is significant policy change from the existing OP.

It is our opinion that based on the location and attributes of the property that residential is the most appropriate land use. The proposed future residential project would have direct access to Clair Road which is an arterial road. We also note that the property lies within Stage 4 of the Staging of Development which is illustrated on Schedule 6 (also relates to policies contained in Section 3.21.1 of the Draft OP); however preliminary servicing analysis indicates that the property can be serviced by municipal water and sewer and storm water management can be appropriately addressed.

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The General Residential designation in the existing OP allows a net density up to 100 units per hectare. At this time, the density of the proposed development for the property would meet the policies of the existing OP (i.e. under 100 units per hectare). However, the Draft OP now has four different residential designations including Low Density Residential, Low Density Greenfield Residential, Medium Density Residential and High Density Residential which each have individual minimum and maximum net density requirements. The Low Density Residential designation (which is to apply to the Built-Up Area) has a minimum net density requirement of 15 units per hectare and a maximum net density of 35 units per hectare. This is substantially lower than what has been historically permitted in the General Residential designation in the OP. We would further question the need to differentiate density requirements between Low Density Residential and Low Density Greenfield Residential. Based on the Draft OP and our preliminary concept plan, the proposed development would now be required to have a Medium Density Residential designation to permit a net density of between 35-100 units per hectare.

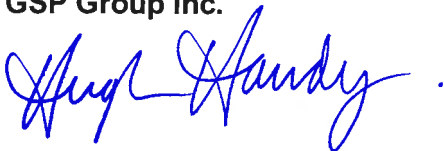
Accordingly, it is our opinion the requirement for a Secondary Plan is unwarranted. Policies similar to the existing OP should be included in the Draft OP to provide consideration of an Official Plan Amendment (and other related planning applications) for properties such as 331 Clair Road. Alternatively the property could be designated Medium Density Residential at this time as has been done in other areas of the City through OPA 48.

We would appreciate formal notification of any future meeting of Council related to this matter and notification of adoption of OPA 48.

Thank you for considering our comments. We would appreciate a formal response to our letter. We would also be happy to meet with City staff to further discuss the matter at their convenience.

Yours very truly,

GSP Group Inc.



Hugh Handy, MCIP, RPP
Associate, Planner

cc Pete Graham, Acorn Developments
 Peter Fitzgerald, Stantec
 Al Hearne, City of Guelph
 Melissa Aldunate, City of Guelph



PLANNERS
URBAN DESIGNERS
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March 30th, 2012

File No.: 10051

City of Guelph
City Hall, 1 Carden Street
Guelph, Ontario
N1H 3A1

Attn: Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update Phase 3
Official Plan Amendment No. 48
11 Woodlawn Road West, City of Guelph**

As the authorized agent for 6 & 7 Developments Ltd., we are pleased to provide comments on the draft Official Plan (Envision Guelph) for the City of Guelph ("draft OP"), dated January 2012. By way of history, GSP Group provided comments on May 20, 2010 on the previous draft of the Official Plan, which was released in April 2010.

6 & 7 Developments Ltd. owns land known municipally as 11 Woodlawn Road West, which is located at the northwest corner of Woodlawn Road and Woolwich Street (the "Site"). The Site is approximately 40 acres in size and contains a Walmart store and a number of commercial buildings. The Site has Site Plan Approval in place for all buildings; however, there are a few remaining buildings to be constructed.

The proposed designation of the Site in the draft OP is "Community Mixed Use Area" and "Significant Natural Areas", which essentially brings forward the overall arching policy direction as a commercial node from the current Official Plan, as well as the protection of sensitive environmental features on the northern boundary of the Site. While the overall importance of the Site for commercial use has been recognized by the draft OP, after reviewing the document we have a number of concerns and issues that we would appreciate further clarification from City staff and are prepared to work with the City to resolve.

While this not an exhaustive list of issues and concerns, the following represents major areas that we would appreciate further consideration and review by City staff, including:

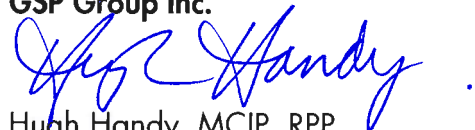
- Section 9.4.2 b) states that “to realize in the long term an urban village concept through a mix of uses, in a compact urban form with a main street experience and attractive private and public open spaces, such as urban squares.” The policies do not define “urban village” as such, there is little direction on the intended vision.
- Section 9.4.2.3 states that “development will be comprehensively planned and integrated with the overall Community Mixed-use Node and in accordance with any applicable concept plans or urban design studies as per the policies of Section 3.11.” As noted above, the Site has Site Plan Approval for the full build-out of the property. We have concerns that surrounding lands, which are located with the Node redevelops, a “concept plan” would be required for the entire node. We would appreciate confirmation that any “concept plan” would reflect the site layout provided in the Approved Site Plan.
- Section 9.4.2.4 states that “residential uses are intended to be incorporated into Community Mixed-use Centres through the development of mixed-use buildings or medium or high density housing.” The proposed wording of this policy continues to be prescriptive in requiring residential uses on the Site, as part of a mixed use development. Again, as noted, the Site has full Site Plan Approval for the build-out of the property; however, through the evolution of site design and tenant requirements, amendments to the approved plans are expected. The incorporation of residential uses will likely not be feasible for the foreseeable future and may in fact extend beyond the 20-year planning horizon.
- Section 9.4.2.6 states that “Community Mixed-Use Centres are strongly encouraged to incorporate Main Street type development in strategic locations....” We would request that the City confirm the intention of “Main Street” type development for this particular Site? We would also question the intent of minimizing the “width of storefronts”. If this Site is part of Node that is intended to incorporate larger floor space users, why is the width limited and controlled?
- Section 9.4.2.12 provides the permitted uses within the Community Mixed-use Node and includes “urban squares and open space”. We would note that there is no definition of this use in the draft OP to guide landowners and we would question the intention and purpose of including such uses.

- Section 9.4.2.18 states that "the minimum height is two (2) storeys for buildings fronting onto arterial and collector roads and identified main streets and the maximum height is ten (10) storeys". The draft policy is unclear on the meaning of two (2) storeys. Is the intention for two functioning storeys or the appearance of 2 storeys? It is our preference for the draft OP to require the appearance of 2 storeys.

We would appreciate a formal response to our letter. We would also request that GSP Group Inc. (c/o Hugh Handy) be added to the circulation list for all future information related to OPA 48. Should you have any questions in the meantime, do not hesitate to contact me.

Yours very truly,

GSP Group Inc.



Hugh Handy, MCIP, RPP
Associate, Planner

cc Emily Edmunds, SmartCentres
Melissa Aldunate, Senior Policy Planner



March 30, 2012

Project No. 10008

City of Guelph
1 Carden Street
Guelph, ON N1H 3A1

Attn: Mr. Blair Labelle, City Clerk

**Re: Envision Guelph – Official Plan Update, Phase 3
Official Plan Amendment No. 48
9 Valley Road and 1242 and 1250 Gordon Street, Guelph**

PLANNERS
URBAN DESIGNERS
LANDSCAPE ARCHITECTS

We act for the property owners on land use planning matters with respect to the above-noted properties (the "Site"). The Site is located on the east side of Gordon Street, at the intersection of Gordon Street and Edinburgh Road. The Site has a combined lot area of approximately 5 acres with frontage on Gordon Street and Valley Road. Each property currently contains a single detached home.

We submitted comments for the above-noted properties on May 20, 2010 in relation to the first draft of the OP update (April 2010 draft of Envision Guelph known at that time as OPA 42). To date the owners have not proceeded with formal planning applications or commenced with technical studies in support of the redevelopment of the properties.

The Site is within the "Built-Up Area" and within the "Intensification Corridor" as illustrated on Schedule 1: Growth Plan Elements. Based on policies implemented through OPA 39 (Conformity with the Planning Framework of the Growth Plan for the Greater Golden Horseshoe), a minimum of 40% of the City's annual residential development must occur in this area.

We note that the City is considering a High Density designation for a portion of 1242 and 1250 Gordon Street as illustrated on Schedule 2: Land Use Plan. In principle, the owners support that designation. However, at this time we have a few concerns related to the policies and designations applying to our Site.

Our first concern relates to the height and density requirements of the High Density designation. As proposed the height of buildings would be limited to 10 storeys and the net density cannot exceed 150 units per hectare. In general we would question the height and density limitations of the High Density designation in the Draft OP. Further, in relation to the Site, we would question whether additional height and density is warranted given it lies within the Intensification Corridor along Gordon Street.

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Our second concern relates to the Built Form policies for High-Rise Buildings contained in Section 8.9. As indicated above, we have not tested these policies on a development plans or architectural plans for the Site. We are concerned with the suggested limitation of floor plate sizes above 5 floors and that parking should be provided primarily below grade.

Our third concern relates to 9 Valley Road. It appears that the properties north of our Site fronting on to Gordon Street have been included in a Medium Density designation. It appears from our review of Schedule B that the 9 Valley Road property may be included with the Low Density Residential designation. We would appreciate confirmation of the designation of 9 Valley Road. If it is determined that the Medium Density Residential designation along Gordon Street is adjacent to 9 Valley Road it may be appropriate to put in the Medium Density designation in place for this property.

Thank you for considering our comments. We would be happy to discuss this matter further with City staff at their convenience and would appreciate a formal response to our comments.

We would also appreciate formal notification of any future meeting of Council related to this matter and notification of adoption of OPA 48.

Yours very truly,

GSP Group Inc.



Hugh Handy, MCIP, RPP
Associate, Planner

cc Owners
John Valeriote/Rob Mullin, SmithValeriote LLP
Al Hearne, City of Guelph
Melissa Aldunate, City of Guelph

AIRD & BERLIS LLP

Barristers and Solicitors

Steven A. Zakem
Direct: 416.865.3440
E-mail: szakem@airdberlis.com

March 28, 2012

File No. 94693

VIA EMAIL (clerks@guelph.ca)

Mayor and Members of Council
City of Guelph
City Hall, 1 Garden Street
Guelph, ON N1H 3A1

Attention: Blair Labelle, City Clerk

Dear Mr. Labelle:

Re: Proposed Official Plan Amendment No. 48
Public Meeting Date: April 2, 2012

We are counsel to Silvercreek Guelph Developments Limited.

As the City is aware, our client owns approximately 22 hectares of land known as the Silvercreek Junction at 35 and 40 Silvercreek Parkway South (the "Lands"). The Lands comprise a decommissioned gravel pit and have been vacant since 1994. In January 2010, the Ontario Municipal Board approved our client's applications, supported by the City and the Howitt Park Neighbourhood Residents Association, for an Official Plan Amendment and Zoning By-law Amendment to permit a mixed-use development comprised of a Mixed Use Node, Business Park and High Density Residential components. The approval followed a five-year process of application review and negotiations between the parties. Since that time, our client has been progressing toward the next stage of approvals.

Our client has been an active participant in the Official Plan review process. It has previously provided written comments with respect to the draft Plan on May 20, 2010 and July 26, 2010. In addition, we have met with City Staff to discuss potential revisions to the proposed Official Plan update.

We have now had an opportunity to review the updated draft of Official Plan Amendment No. 48 and hereby provide the following comments on behalf of our client:

1. Section 1.3.5: Silvercreek understands that the site-specific policies of section 9.13.2.5, as they may be amended, prevail over all inconsistent policies of OPA 48.

2. 3.16 and 4: Silvercreek has identified its issues with respect to OPA 42 as part of the Ontario Municipal Board pre-hearing process and earlier submissions to Council. It has also indicated that OPA 42 ought to be evaluated in light of the full slate of policies now put forward as OPA 48, rather than in isolation. Alternatively, OPA 48 ought to reflect the ultimate disposition of the appeals with respect to OPA 42.
3. 8.23.3: We understand that the words "assist in the interpretation and definition" underscore the intended status of the urban design guidelines as illustrative but not mandatory.
4. 9.3.4, 9.3.5, 9.4.21, 9.5.3.18 and 9.5.3.19: The encouragement of structured or underground parking should be balanced with economic considerations, so that the policies do not act as a deterrent to development.
5. 9.4.2.4: Provisions should be made to permit, but not require residential uses as part of Community Mixed-use Centres, as well as to recognize existing and/or proposed high density residential uses in close proximity to the Centres.
6. 9.4.2.4: Townhouses should be set out as a permitted use. This is consistent with the current site-specific provisions for Silvercreek Junction.
7. 9.4.2.6: The market may not support the provision of residential uses above commercial uses and multi-storey buildings fronting onto main streets. As such, the features encouraged by this section may not be attainable or feasible. We note that section 4.5 of the Provincial Policy Statement requires Official Plan policies to be reasonable and attainable. Features such as usable second storeys above commercial uses, multi-storey buildings fronting onto main streets, structured or underground parking may well appear in the long term, potentially beyond the horizon of the Plan and certainly not before the next five-year review of the Plan. At present and for the foreseeable future, requiring such features reduces the value of the land and adds to the amount of required parking, thereby limiting the potential for intensification.
8. 9.4.2.17: The proposed cumulative gross floor area maximum for two of the existing Mixed Use Nodes/Community Mixed-use Centres, Woodlawn/Woolwich and Paisley/Imperial, have increased substantially since the in-force Official Plan and the previous draft of the Official Plan update. Our client questions the basis for the increase and requests clarification of the same, particularly in light of the amount of consideration and review that these maximums have received in recent years.


9. 9.4.2.19: This policy regarding maximum net density appears to be inconsistent with including permissions for townhouse units in Community Mixed-use Centres.
10. 9.4.2.22: Minimizing the amount of surface parking in Community Mixed-use Centres may not be realistic and achievable.
11. 9.13.2.5: Silvercreek has submitted an application for an amendment to the Official Plan to modify the site-specific policies applicable to the Lands. The application (file no. OP1201) seeks to modify the range of permitted uses to include a food store and allow building permits to be issued no sooner than September 1, 2012. Silvercreek submits that policy 9.13.2.5 should be revised to reflect the modifications sought by Silvercreek's Official Plan Amendment application.
12. The Minutes of Settlement between the City and Silvercreek indicate that the City would bring forward an amendment to its Brownfield Community Improvement Plan to permit retroactive applications under the TIBGP, for eligible costs, notwithstanding the fact that the costs were not pre-approved by the City. We would request that such an amendment be brought forward.

Our client will continue to follow the Official Plan review and reserves the right to provide additional comments as the process unfolds.

We would be pleased to discuss our comments further with Staff.

Yours truly,

AIRD & BERLIS LLP



Steven A. Zakem
SAZ/TH/ly

c: Matthew West, Silvercreek Guelph Developments Limited
Astrid J. Clos, Planning Consultant
Al Hearne, Manager of Development, City of Guelph

12125714.2



March 28, 2012

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Todd Salter, General Manager, Planning and Community Services

Dear: Mr. Salter

RE: Envision Guelph – Released January 30, 2012
Thomasfield Homes Limited, 99 Maltby Road

Thomasfield Homes Limited is the owner of 99 Maltby Road. This property is approximately 32 hectares in area. The current use is agricultural.

Current Official Plan

The current City of Guelph Official Plan (November 2006 Consolidation) Schedule 1 – LAND USE PLAN designates this property as Reserve Lands, Core Greenland and Non-Core Greenland Overlay. The purpose of the Reserve Lands designation (section 7.16) is;

“b) To outline areas that may be required for future urban **expansion beyond the year 2021.**”

Schedule 4 – STAGING OF DEVELOPMENT includes the subject property in the Stage 2 area. Also included in the Stage 2 lands is the Hanlon Creek Business Park which is now being developed. The portions of the Stage 2 lands along the Hanlon Expressway are also being developed as the Southgate Business Park.

“4.2.2 b) STAGE 2

Priority for the extension of municipal trunk services to support new urban development shall be given to those lands designated as Stage 2 servicing areas. Development proposals in Stage 2 areas will be considered as services become available to the various parcels, and Council indicates that the City is prepared to provide the required trunk services. The implementing Zoning By-law, and its associated amendment process, may be used as a regulatory mechanism to prevent pre-mature zoning of land for activities that do not have adequate municipal services associated with them.”

South Guelph Secondary Plan (OPA No. 2)

Official Plan Amendment No. 2 is the South Guelph Secondary Plan approved by the Minister August 17, 1998. The purpose of this document as stated in OPA No. 2 is,

"The purpose of this Secondary Plan is to introduce new planning policies for southern areas that were annexed by the City from the Township of Puslinch in 1993."

The final report with respect to the annexation dated 1990-91, *"recommended the annexation of approximately 4,300 acres of land from the Township of Puslinch and the Township of Guelph to the City of Guelph to accommodate the long-term growth of the City for a 20 year period."*

Based on the calculations used by the City to justify the annexation of the Clair-Maltby lands in 1993, the Clair-Maltby lands were needed to accommodate development that would occur by 2011.

OPA No. 39 Local Growth Plan

Schedule 1B – GROWTH PLAN ELEMENTS of OPA No. 39 designates the subject property as "Greenfield Area" with a minimum target density of 50 residents and jobs per hectare.

"2.4.4.1 The City will meet the forecasted growth within the settlement area through:

- c) planning for a **minimum density of 50 residents and jobs per hectare in the greenfield area.**"*

Existing Township of Puslinch Zoning

The subject property was included in land annexed into the City in 1993. The Township of Puslinch Zoning is retained on the subject property. The property is in the Agricultural A Zone and the Hazard H Zone.

Envision Guelph (Released January 30, 2012)

We have reviewed the proposed Draft Official Plan and are providing the following comments with respect to the subject property.

Draft Schedule 2: Land Use Plan, proposes to designate the subject property as "Reserve Lands" and Significant Natural Area (currently under appeal). A new boundary has been included on this schedule delineating a "Secondary Planning Area" which now includes the subject property.

Section 9.10 of the Official Plan states that the *"Clair-Maltby lands may be required for future urban development **beyond the year 2031.**"* These lands were annexed in 1993 by the City from the Township of Puslinch on the basis that there was a need for these lands **by 2011**. The Clair –Maltby lands should be a priority for the City to expedite for development. These lands should be included in the Places to Grow targets to 2031. The Clair-Maltby lands should be included in Stage 3 on Schedule 6 and it should be a priority for the City to initiate and complete a Secondary Plan for this area.

Draft Schedule 6 – STAGING OF DEVELOPMENT, proposes a dramatic change in comparison with the current Official Plan. The subject property is within Stage 2 under the current Official Plan, which is the same staging as the Guelph Innovation District York District Lands) and the Hanlon Creek Business Park. Whereas the draft Official Plan is proposing a significant change in the timing from Stage 2 to Stage 4 for the subject property. (by contrast the York District Lands are proposed as Stage 3)

The importance of including the “Reserve Lands” in the Clair-Maltby area within the Places to Grow population target is demonstrated by Tables 1 to 3.

Table 1: Guelph Total Land Area	
	hectares
Natural Heritage System ¹	1,947
Urban Growth Centre and Built-Up Area	5,586
Greenfield Areas	1,317
Guelph Total Land Area	8,850
¹ <i>Natural Heritage System lands under appeal</i> (Source: Thomasfield Homes Limited, March 20, 2012)	

Table 2: Estimated Area for Future Residential Development in Greenfield Areas¹	
	hectares
Northeast (Woodlawn-Victoria)	24
East (Grange-Watson)	3
East (York District Lands) ²	61.8
Southeast (Arkell-Victoria)	33.8
Northwest (Elmira Rd-Speedvale)	0
South (Clair-Gordon-Maltby) ³	173
TOTAL	+/- 295.6
¹ <i>Estimated vacant residentially designated land</i> ² <i>Assumes that of 206 ha gross developable 30% is for residential land uses</i> ³ <i>Includes “reserve lands” and residentially designated lands in south-end, assumes these lands form part of urban land supply pre-2031</i> (Source: Thomasfield Homes Limited, March 20, 2012)	

As shown in Table 1, the City has identified 1,317 hectares of Greenfield Areas, however, portions of the Greenfield Areas are slated for non-residential development such as the Hanlon Creek Business Park. Table 2 summarizes the amount of residential land available within the Greenfield Areas. Based on this estimation, there is roughly 300 hectares of land available for residential development in the Greenfield Areas.

Places to Grow requires that Greenfield Areas meet a minimum density target of 50 persons per hectare. Based on 300 hectares being available in Guelph for residential development in the Greenfield Areas from Table 2, under 5,000 units can be developed in the Greenfield Areas available for residential development. This is a shortfall of approximately 11,000 units to meet the Places to Grow target.

Table 3: Available Units Based on Table 2	
Greenfield Areas identified for future residential development (from Table 2)	295.6 hectares
Places to Grow target for Greenfield Areas Persons per hectare	50 persons per hectare
Places to Grow target for Greenfield Areas Units per hectare (3 persons per unit)	16.67 units per hectare
UNITS in Greenfield Areas identified for future residential development (50 persons per hectare)	4,928 units
Places to Grow Target for units in Greenfield Area to 2031	15,960 units
The residential Greenfield Area land supply in Guelph is deficient by approximately	11,032 units
<i>(Source: Thomasfield Homes Limited, March 20, 2012)</i>	

It is important that initiation of the Secondary Plan be made a priority for the Clair-Maltby area. The subject lands should not be placed in a "Stage 4" designation given the importance of the "Reserve Lands" to meet the Places to Grow targets by 2031.

Please provide us with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to these proposed policies.

Yours truly,



Tom Krizsan
President

cc: Mayor Farbridge and Members of Council
Astrid J. Clos Planning Consultants (via email)



ZELINKA PRIAMO LTD

A Professional Planning Practice

VIA EMAIL AND REGULAR MAIL

March 29, 2012

Clerk's Department
City of Guelph
City Hall, 1 Carden Street
Guelph, ON
N1H 3A1

Attention: Mr. Blair Labelle, City Clerk

Dear Mr. Labelle:

**Re: City of Guelph Draft Official Plan Amendment Number No. 48
Preliminary Comments on Behalf of Loblaw Properties Limited
Guelph, Ontario
Our File: LPL/GPH/04-01**

We are the planning consultants for Loblaw Properties Limited (Loblaw) for City of Guelph draft Official Plan Amendment No. 48 (OPA 48). Loblaw is the owner or lease holder of the following lands within the City of Guelph, including lands that are currently subject to planning approvals:

- The vacant lands at 115 Watson Parkway North (formerly 72 Watson Road North), which are subject to a Zoning By-law Amendment Application (File No. ZC0512) and an application for Site Plan Approval (File No. SP05C051);
- The vacant lands at 1750 Gordon Street, which are subject to an application for Site Plan Approval (File No. SP07C013). Please note that GSP Group are the agents for the application and have been copied on this letter;
- The existing Zehrs store at 1045 Paisley Road;
- The existing Zehrs store at 297 Eramosa Road, which is subject to an application for Site Plan Approval (File No. SP11C027);
- The existing No Frills store at 191 Silvercreek Parkway North;
- The existing No Frills store at 35 Harvard Road; and
- The existing Zehrs store at 160 Kortright Road West.

On Thursday April 29, 2010 Loblaw was made aware of the draft Official Plan Amendment No. 42 (OPA 42). Originally, OPA 42 was a comprehensive new Official Plan document that would replace the current Official Plan. On behalf of Loblaw, we submitted preliminary comments dated May 20, 2010. The Statutory Public Meeting was held on May 20, 2010, at which time Staff were directed by Council to proceed with the natural heritage system components of the draft Official Plan for Council's consideration and adoption. On July 27, 2010 Council passed OPA 42 and OPA 42 was approved with

modifications on February 23, 2011. On March 14, 2011, Loblaw Properties Limited appealed OPA 42.

On October 5, 2011, we met with Staff to discuss our concerns with policies from the original OPA 42, which the exception of the natural heritage policies as approved under OPA 48.

In January 30, 2012, a Staff Report was released with draft OPA 48, representing Phase 3 of the Official Plan update. The Staff Report included Staff responses to our comments on behalf of Loblaw dated May 20, 2010. On February 29, 2012 Loblaw was made aware of the April 2, 2012 Public Meeting for Guelph OPA 48.

On behalf of Loblaw, we have the preliminary comments as outlined below, and will continue to review the draft OPA 48 policies in more detail, and may provide further comments as required. Please note that the references below to "former Section" refers to the policies under the April 2010 draft OPA 42.

At this time, our preliminary comments for OPA 48 are as follows:

- We reiterate our general comments from May 20, 2010:
 - The ongoing Zoning By-law Amendment and Site Plan Approval applications as described above should continue to be considered under the current, in force, Official Plan and policies;
 - We respectfully suggest that there should be wording to provide for flexibility or a recognition that policies will be implemented and transitioned over the long term as development and intensification comes to fruition;
 - It would be appropriate to include wording for implementation of the Official Plan Amendment whereby existing development approved under previous amendments is deemed to conform to the Official Plan, and that minor extensions or expansions of non-conforming development are permitted without amendment. From the January 30, 2012 Staff response, it is noted "Transitional wording is not required in the OP to recognize existing approvals as these would be subject to relevant provisions of the Planning Act and related regulations. Any new applications for site plan or other type of development would be required to meet the policies in place at the time of application"; and
 - The overall Built Form, Public Realm and other urban design policies may not be appropriate to individual sites, and may result in unforeseen, adverse conditions if not implemented and interpreted in a flexible manner.
- Section 3.11.3: The policy that "Commercial uses within the Nodes will be integrated more fully with surrounding land uses and will accommodate mixed-use buildings" raises concerns as to flexibility, if commercial retail uses are required to be accommodated only within mixed-use buildings featuring residential uses.
- Sections 3.11.4 to 3.11.6: We have a concern over the requirement for concept plans and how concept plans are intended to be implemented. We are concerned that the use of concept plans may reduce flexibility, as they may be prescriptive. At the same time, there is a lack of clarity as to their status, whether land owners can comment on the concept plans, how the concept plans will be approved and if the concept plans can be appealed. Lastly, the use of the "Main Street area" terminology is unclear, as there is no definition and main streets are not

designated under draft OPA 48. It is not clear how concept plans and the “Main Street area” terminology relate to the policies under Section 5.8.11 for Road design, which states “Main Streets may be identified on arterial or collector roads in Downtown or in areas of existing or planned high density including Intensification Corridors and Community Mixed-Use Nodes.”

- Section 3.21.1.3 (formerly Section 5.4.2.3): A definition of “municipal services” is still not provided, and it remains unclear whether roads would be included. Clarification is requested.
- Section 8.2.10 (formerly Section 7.4.9): We continue to be concerned that there is a lack of flexibility in the Public Realm policies related to locating built form and placing principal building entrances towards the street and maintaining or extending a continuous building façade or streetwall along the street. From the January 30, 2012 Staff response, it is noted “Concerns about how a policy would be applied would be addressed by staff at the time of a development application. Many policies will have site specific and development specific solutions to achieving the policy direction.” We continue to suggest that “New development shall be designed...” be changed to “New development is encouraged to be designed...” in order to reflect Staff’s confirmation that site specific and development specific solutions will be required.
- Section 8.3.6 (formerly Section 7.5.6): The wording “where possible” has been removed from the existing policy 7.4.46.2, while the “visual access” wording is new. From the January 30, 2012 Staff response, it is noted “Staff continue to support the appropriate siting of parking including avoiding areas adjacent to natural heritage features *where feasible* [emphasis added].” We continue to be concerned that the policy no longer provides for flexibility and respectfully suggest that the wording “where possible” be reinserted as per the Staff response, while the term “visual access” lacks clarity. In addition, we are concerned that the lack of flexibility will create a conflict with Section 8.2.10 where built form is required to be placed adjacent to the street edge.
- Section 8.6.2 (formerly part of Section 7.8.1): The policy related to blank facades will impact upon commercial buildings where exterior walls may not have consistent windows at ground level due to the requirements of internal operations.
- Sections 8.10.1, 8.10.2 and 8.10.3 related to vehicle-oriented uses: In general our concern is that the policies are not flexible in terms of locating drive-through lanes and the requirement for the employment of a liberal use of clear glazing and openings for service stations facing the street, while there is a lack of clarity as to which zoning categories may restrict permissions for drive-through facilities.
- Section 8.12.5 (formerly Section 7.14.7): For 115 Watson Parkway North, the avoidance of parking adjacent to the proposed buffer for the natural heritage feature is difficult at best for commercial uses. It is not clear whether there must be an intervening building, or whether a landscape strip qualifies as a separator. If not the latter, then it would be impossible, not difficult to accommodate, since long buildings cannot be placed at both the street edge as required under Section 8.2.10 and the back of the lands as required under Section 8.3.6.
- Section 8.20.1 through 8.20.4 (Formerly Sections 7.22.1 through 7.22.4): We continue to have a concern with the lack of flexibility whereby urban squares “shall generally be included”, while the lands for urban squares would only be

provided through easement or dedication and not through expropriation or purchase, while urban squares would not be considered as part of parkland dedication when held under private ownership (Section 7.3.5.4).

- Community Mixed-Use Centre:
 - Section 9.4.2.b): It is unclear how the use of the term “main street” relates to Section 5.8.11 as noted above.
 - Section 9.4.2.1 (formerly Section 8.5.1.2.2): It would appear that “...with a node” should be “... within a node”.
 - Section 9.4.2.2 (formerly Section 8.5.1.2.3): We are concerned with the policy that “Implementing Zoning By-laws may include mechanisms, such as minimum height and density requirements and maximum parking standards, to promote the efficient use of the land base” in the context of our comments below, including for Section 9.4.2.18.
 - Section 9.4.2.3: As outlined below, we are concerned with the policies related to concept plans as per the policies of Section 3.11.
 - Section 9.4.2.4: Within the context of Section 3.11.3, it is not clear whether residential uses are required to be incorporated into retail commercial buildings.
 - Section 9.4.2.6 (formerly Section 8.5.1.2.5): We are concerned with the general lack of flexibility. It is unclear how the use of the term “main street” relates to Section 5.8.11. We are unsure as to the reasoning for limiting store widths. As noted above, we are concerned with the requirement for multi-storey buildings as outlined below, and it is unclear whether medical office and dentist uses will be limited on the ground floor.
 - Section 9.4.2.9 (formerly Section 8.5.1.2.8): We are concerned with the limitations on length of frontage along arterial roads that may be used for surface parking as to how this may impact upon 1750 Gordon Street and the proposed parking field in front of the store.
 - Section 9.4.2.12 (formerly Section 8.5.1.3.1): We request clarification as to the removal of the reference to the permission that would include restaurants.
 - Section 9.4.2.16 (formerly Section 8.5.1.3.5): There is a lack of clarity as to the definition of “main street-type environment” and of “peripheral sites” and how the policy will be interpreted for lands such as 115 Watson Parkway North and 1750 Gordon Street. From the January 30, 2012 Staff response, it is noted “Peripheral site means that large buildings would be situated away from intersections and main streets to allow for improved building placements along street frontages.” With our concerns related to the main street terminology as outlined above, it is unclear how “peripheral site” will be interpreted for 115 Watson Road, where under the Staff illustration of the policies from the Open Houses a “main street” is shown running across the lands and for 1750 Gordon Street where the site is oriented parallel to Gordon Street.
 - Section 9.4.2.18 (formerly 8.5.1.4.5): It is not clear whether expansions to existing buildings would need to be a minimum of two (2) storeys of usable space. There is a lack of flexibility, for example, for the permitted freestanding individual retail uses exceeding 5,575 sq. m, while it is not clear whether a partial mezzanine would satisfy the 2 storey requirement for “usable space”. In addition, we note our concerns above over the “main street” terminology,

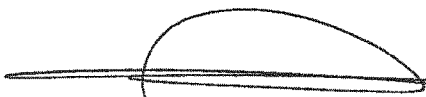
since for example for 115 Watson Road, under the Staff illustration of the policies from the Open Houses, a "main street" is shown running across the lands. From the January 30, 2012 Staff response, it is noted "Policy related to minimum building height of 2 storeys has been revised to indicate that the minimum height is required only along arterial and collector roads and identified 'main streets'." Clarification is requested.

- Mixed-Use Corridor:
 - Section 9.4.3.9 (formerly Section 8.5.2.4.4): For the minimum height of two (2) storeys buildings fronting onto arterial and collector roads, it is not clear whether the requirement would apply to expansions to existing buildings.
- Neighbourhood Commercial Centre:
 - Section 9.4.4.14 (formerly Section 8.5.3.3.4): Clarification is requested as to whether a second floor mezzanine within a commercial building would be considered an "upper floor".
 - Section 9.4.4.15 (formerly Section 8.5.3.4.2): For the minimum height of two (2) storeys for buildings fronting onto arterial and collector roads, it is not clear whether the requirement would apply to expansions to existing buildings.

Should you have any questions, or require further information, please do not hesitate to call. In addition, we have previously requested notification of any further meetings with respect to this matter as well as notice of the Official Plan Amendment.

Yours very truly,

ZELINKA PRIAMO LTD.


FOR: Jonathan Rodger, MScPI, MCIP, RPP
Senior Planner

- cc. Loblaw Properties Limited (Via Email)
Mr. Steven Zakem, Aird & Berlis LLP (Via Email)
Mr. Tom Halinski, Aird & Berlis LLP (Via Email)
Mr. Hugh Handy, GSP Group (Via Email)
Mr. Al Hearne, Acting Manager of Development, City of Guelph (Via Email)
Ms. Melissa Aldunate, Senior Policy Planner, City of Guelph (Via Email)

March 30th, 2012

Mr. Blair Labelle
City Clerk
City of Guelph
City Hall
1 Carden Street
Guelph ON N1H 3A1

Re: Official Plan Update (OPA 48)

Dear Mr. Labelle:

Thank you for the opportunity to provide comments regarding the City's proposed Official Plan update. We have been involved in the review process and attended a number of meetings with City staff to discuss same. In addition, we have participated in this initiative as part of the Guelph Wellington Development Association.

We would like to commend City staff for undertaking this significant initiative which will assist in shaping future growth in the City to the year 2031. We are generally supportive of the principles to guide the community into the future and in particular intensification efforts and opportunities related to the downtown area. In addition, we believe that an appropriate mix of housing types is necessary to accommodate the needs of residents across the City including the lands outside the built up area identified on Schedule 1.

In our review of the draft document, we have concerns about and feel that a number of policy areas require further consideration and review by staff. These include the following:

- Need to ensure that population and employment targets can be accommodated within the urban area boundary identified in Schedule 2 (Sections 3.2 and 3.3)

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- Affordable housing target levels place onus exclusively on new development to accommodate such needs yet should rely on opportunities within existing housing stock as well (Section 7.2.1)
- Urban design details in particular those that would limit the ability to brand and therefore market new communities need to be reconsidered and eliminated (Sections 8.4.7 and 8.4.8)
- Approval of secondary plans as outlined in the general provisions of the new official plan could raise conformity issues (Section 9.12.1)
- Density provisions may limit the consideration of development in subsequent secondary plans in particular the proposed Downtown Secondary Plan (Section 9.3.5)
- Proposed policies related to 'Protecting What is Valuable' (Section 4) seem overly onerous on the proponent of development when Provincial legislation and Conservation Authority regulations and provisions already prevail (Sections 4.4.1 and 4.4.4)
- Built form provisions in high rise buildings related to underground parking need to be practical due to cost implications (Section 8.9)
- Private roads are generally discouraged yet will continue to form important components of condominium developments on a go forward basis (Section 5.6.3)
- Open space area, linkage and urban square requirements should form part of the five percent parkland dedication requirements of any development (Sections 7.3.1.8 and 7.3.2)
- Lands identified as 'Special Study Area' within the southeast quadrant of Stone Rd East and Victoria Rd South should be designated as 'Mixed Use' to accommodate retail, office and a variety of residential uses (Schedule 2)

In our view, the proposed official plan document needs to provide guidance regarding the future development of the City. At the same time, it is respectfully submitted that the proposed plan should provide a level of flexibility to accommodate market shifts and other changing circumstances over the planning period. In general, we suggest that the prescriptive nature of many of the policies proposed in the draft official plan be left to the zoning and site planning stages.

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We look forward to continuing our discussions with City staff in addressing the above matters and concerns in greater detail.

Yours truly,



Larry Kotseff
Vice-President, Planning & Development

Cc Lee Piccoli, Fusion Homes
 Todd Salter, City of Guelph
 Melissa Aldunate, City of Guelph

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March 30, 2012

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Todd Salter, General Manager, Planning and Community Services

Re: **Envision Guelph – Released January 30, 2012**
Public Meeting April 2, 2012

The Guelph and District Home Builder's Association has reviewed the Draft Official Plan and provides the following comments.

Section 4.7.4.1 of the Draft Official Plan states that, "*New residential, commercial and institutional development shall achieve an **improvement of 1.5% per year over the 2012 Ontario Building Code energy efficiency requirements.***" This arbitrary 1.5% amount cannot be implemented or regulated by the Building Department. This section should be removed from the Official Plan.

Section 5.6.3 states that, "*Generally, **private roads shall be discouraged.** Where permitted they shall generally be **designed to be publicly accessible.***" Private roads are required for cluster townhouse sites, for example, and will help the City achieve its *Places to Grow* population targets. How or why would a private road be designed for public access? This section should be removed from the Official Plan.

Section 6.6.3 states that, "*The City will facilitate a reduction in energy consumption for the construction and servicing requirements of subdivisions and other development by **requiring gravity feed sanitary sewers.***" This section should be amended to include the words "where possible" since gravity sewers are not always physically possible to provide.

In section 7.2.1.2 the target of "**3% affordable rental housing units**" for new development should be removed from the Official Plan since the City cannot regulate or control the tenure of housing.

In Section 9.9 the completion of the **Secondary Plan for the Clair-Gordon Area** is discussed. The Official Plan must be revised to make this a high priority for the City. These lands are required to meet the *Places to Grow* targets for Guelph. The employment lands coming on stream will be negatively impacted by the lack of housing available for employees. The current constrained supply of land in Guelph will have a negative impact on the cost of housing throughout the City.

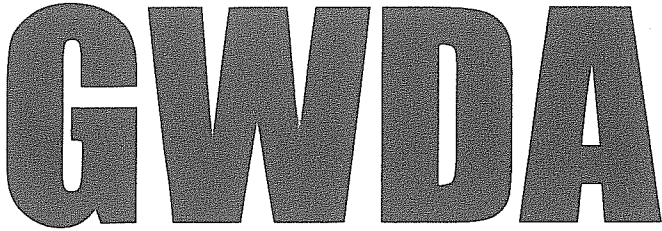
Please provide me with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to these proposed policies and our suggested policy changes.

Yours truly,
A handwritten signature in blue ink, appearing to read "Glenn Anderson".

Glenn Anderson, President

cc: Mayor Farbridge and Members of Council

(gdhba Envision Guelph.doc)



March 30, 2012

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Todd Salter, General Manager, Planning and Community Services

Re: **Envision Guelph – Released January 30, 2012**
Public Meeting April 2, 2012

The Guelph Wellington Development Association was founded in 1970. The mandate of our Association includes *"promoting the development of the City of Guelph in an orderly manner and upholding the use of sound planning principles."* Our industry creates jobs and prosperity. Our members are innovative and lead with sustainable and progressive projects.

The members of our Association have spent countless volunteer hours reviewing the draft Official Plan, attending meetings and providing comments, which for the most part, have been politely received by City staff and then dismissed. Guelph Council must provide the political leadership to empower City staff to dare to be business friendly while implementing the quadruple bottom line. (social, economic, environment, culture) As acknowledged by the City's Prosperity 2020 Report and the Operational Review, Guelph must work hard to stimulate prosperity and investment rather than drive it away.

The GWDA comments related to the Draft Official Plan are included in the attached chart. Our members sincerely require meaningful changes to the policies in the proposed Official Plan. Important issues are raised in these detailed comments including,

1. One of the most pressing needs is the completion of the **Secondary Plan for the Clair-Gordon Area**. The Official Plan must be revised to make this a high priority for the City. These lands are required to meet the Places to Grow targets for Guelph. The employment lands coming on stream will be negatively impacted by the lack of housing available for employees. The current constrained supply of land in Guelph will have a negative impact on the cost of housing throughout the City.
2. The **affordable housing** target should not be included into the Official Plan until the Affordable Housing Strategy has been approved by Council. The Affordable Housing Strategy must include the existing housing supply in the analysis in order to create a realistic affordable housing target for Guelph.
3. The **urban design** policies must be re-evaluated based on the timing of their implementation (ie. at site plan, not rezoning) and the ability to implement these policies in the context of market realities.
4. The **mixed use** policies must be revisited to ensure that a density of development will actually be constructed to support transit and walkability.

Please provide me with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to these proposed policies and our suggested policy changes.

Yours truly,

A handwritten signature in black ink, appearing to read 'Alfred Artinger', with a stylized, flowing script.

Alfred Artinger, P. Eng.
President

cc: Mayor Farbridge and Members of Council
Ann Pappert, CAO

(gwda Envision Guelph Comments.doc)

GWDA Envision Guelph Comments (March 30, 2012)

Section	Envision Guelph (January 30, 2012 OP Update Phase 3 OPA No. 48	GWDA AND GDHBA comments
3.2.2 ii)	i) planning for a population forecast of 175,000 people by the year 2031; ii) promoting a steady rate of growth equivalent to an average population growth rate of 1.5% annually , which will allow growth to keep pace with the planning of future physical <i>infrastructure</i> and <i>community infrastructure</i> ; and iii) ensuring the employment growth in the City is planned to keep pace with population growth by planning for a minimum of 92,000 jobs by the year 2031 .	Is an annual average population growth rate of 1.5% adequate to meet the population target of 175,000 people by 2031?
3.11	Community Mixed-use Nodes 2. The Community Mixed-Use Nodes will be planned and designed to: ii) provide a mix of commercial, offices and residential development in a higher density <i>compact urban form</i> that supports <i>walkable communities</i> and <i>live/work</i> opportunities; and	The City has presented the revised policies as not requiring residential development in the Community Mixed-Use Nodes. What will the implementing zoning be for the policy requiring a mix of commercial, offices and residential? Residential should not be required in the implementing zoning.
3.14.5	Regeneration areas are areas where a transition of use from industrial to another use is anticipated during the planning horizon of this Plan. Typically, these areas consist of isolated or fragmented sites outside of established or proposed industrial or business parks. The transition of use may be desirable to support improved land use compatibility or to promote reinvestment in underutilized areas of the City. The City may conduct planning studies to determine appropriate future uses for regeneration areas.	Where are these regeneration areas located? Are they shown on a schedule within the OP? The wording of the policy should specifically state that a comprehensive municipal review is not required to change these regeneration areas from industrial to residential for a site specific application.
3.16.2	Development will be prohibited within defined features in accordance with the <i>Natural Heritage System</i> provisions of this Plan.	OPA No. 48 should not preclude the OPA No. 42 appeals related to the natural heritage strategy.
3.21.2.1	Development Priorities Plan iii) sets an annual limit for the creation of potential dwelling units from registered <i>plans of subdivision</i> ;	Is this consistent with the PPS and Places to Grow and meeting the targets?
4.3.3.1	Source Protection i) protect wetlands and other areas that make significant contributions to <i>groundwater</i> recharge;	"Other Areas" that make significant contributions to <i>groundwater</i> recharge can continue to do so after they are developed. Development should be permitted in these

		“Other areas” when groundwater recharge targets can be met. “Steep slopes” should be a defined term in the Official Plan.
4.4.2.1	Erosion Hazards and Hazardous Sites <i>Development within erosion hazards, steep slopes or hazardous sites may only be permitted where...</i> viii) no adverse environmental effects will result.	
4.4.2.8	Areas within the built up portion of the City with slopes greater than 20% may also be required to prepare a Soils Stability and Geotechnical Analysis or engineering assessment by a qualified geotechnical engineer, that ensures slope stability, positive storm drainage and public safety are addressed, to the satisfaction of the City and the Grand River Conservation Authority.	What is the significance of 20% slopes?
4.4.3.1	Notwithstanding the designated land use identified on Schedule 2, future <i>development</i> may be restricted or controlled on lands on, or adjacent to lands identified as Landfill Constraint Areas.	What is the basis for restricting development on designated land?
4.4.4	Potentially Contaminated Properties Potentially contaminated sites are properties where the environmental condition may have potential to cause <i>adverse effects</i> on human health, ecological health or the natural environment.	The MOE definition should be used in the Official Plan.
4.4.5	Noise and Vibration	Vibration policies requiring studies have been added to the OP, however there are no MOE Guidelines related to vibration. What standards will these vibration studies be based on?
4.5	The City recognizes that mineral aggregates are valuable non-renewable resources that are required for most types of construction. Within the corporate boundaries of the City there are limited deposits of mineral aggregate resources remaining .	Is this accurate? Are there mineral aggregate deposits protected by the PPS located south of Clair Road within the corporate boundaries of the City? What does the MNR aggregate mapping show for this area?
4.5.6	<i>Wayside pits and quarries, portable asphalt plants and portable concrete plants</i> used on public authority contracts are allowed without the need for an Official Plan Amendment, rezoning or development permit in all areas, except those areas of existing development or particular environmental sensitivity which have been determined to be incompatible with extraction and associated activities.	Are significant landforms of “particular environmental sensitivity”?
4.6.1	Community Energy The City will establish policies...	The Official Plan must include policies which can

4.7.2.2	Local Renewable and Alternate Energy Generation The City will establish policies...	be reviewed and evaluated <u>not</u> direct the City to "establish" policies.
4.7.4.1	Building End-Use Energy Efficiency New residential, commercial and institutional development shall achieve an improvement of 1.5% per year over the 2012 Ontario Building Code energy efficiency requirements.	What is the legal basis for this policy? This policy should be deleted.
4.8	j) To identify, evaluate and <i>conserve</i> heritage trees which satisfy the criteria for determining <i>cultural heritage value or interest</i> as prescribed by regulation under the <i>Ontario Heritage Act</i> . (O Reg 9/06)	What are the criteria for heritage trees?
4.8.2.4	i) maintaining the original location and orientation to the street and lot pattern;	Add "where possible."
4.8.8.2	Where <i>heritage trees</i> have been identified by the City, they will be protected to the fullest extent possible while having regard to the health of the tree and public safety.	What does "protected to the fullest extent possible" mean?
5.1	Transportation System	Add a policy that, "The City will synchronize traffic signals on arterial roads to reduce idling at red lights, encourage the posted speed limit to be obeyed and lessen delays to transit vehicles.
5.6.3	Generally, private roads shall be discouraged . Where permitted they shall generally be designed to be publicly accessible .	Why are private condo roads discouraged? How can a private road be designed to be publicly accessible? Will private roads be required to have a 20m wide road allowance? Private roads are required to develop infill sites.
6.3.3	Wastewater Treatment The City will facilitate a reduction in energy consumption for the construction and servicing requirements of subdivisions and other <i>development</i> by requiring gravity feed sanitary sewers .	Should add "where possible".
6.6.1	Site Alteration The City will regulate site alteration prior to development, through the Site Alteration By-law, in an effort to: maintain significant landforms; preserve topsoil; minimize impacts on watercourses; minimize flooding or ponding; and preserve vegetation.	Backdoor protection of significant landforms. What makes a slope significant?
7.2.1.2	The annual <i>affordable housing</i> target requires 30% of all new residential development to constitute <i>affordable housing</i> . The target includes an annual target of 27% affordable ownership	Section 1.4.3 of the PPS requires planning authorities to provide for an appropriate range of housing types and densities as well establishing

	<p>units and an annual target of 3% affordable rental housing units.</p> <p>3. An additional separate annual target of 6% of all new residential development has been established for <i>social housing</i>.</p> <p>4. While not part of the annual <i>affordable housing</i> target, the creation of approximately 90 accessory apartment units annually will be encouraged.</p>	<p>minimum targets for affordable housing. The PPS does not dictate what this target should be.</p> <p>The proposed affordable housing target is too high for Guelph.</p> <p>The 3% affordable rental housing target should be removed from the policy since tenure cannot be regulated or implemented by the City.</p> <p>The target should consider how much of the current housing stock meets the affordable housing definition. This is important knowledge to assist the City in creating a target for the future.</p> <p>The affordable housing target should not be included in the Official Plan until the Affordable Housing Strategy has been approved.</p>
7.3.1.8	<p>To improve attractiveness, continuity, accessibility and utility the City will develop linkages between parks at different levels of the park hierarchy. Such linkages may consist of:</p> <p>i) an environmental corridor, ecological linkage or open space area;</p>	<p>Linkages between parks should be included in the required parkland dedication.</p>
8.23.2	<p>Where appropriate, the Zoning By-law will be used to implement the urban design polices of this Plan and include regulations that promote compatibility in built form and appropriate infill projects.</p>	<p>Site Plan Control is the appropriate planning approval to implement urban design. Too many projects are being delayed in the City by urban design details at the time of the zone change application. Zoning applications should be concerned with land use.</p>
7.3.2	<p>Urban Squares</p> <p>Urban Squares will primarily be developed in areas of significant <i>intensification</i> in the City to address increased demands for recreation, parks and cultural opportunities.</p>	<p>Urban squares should be included in the required parkland dedication.</p>
8.4.8	<p>However, entrance features to new subdivisions that create an</p>	<p>Requirements for noise walls due to traffic or</p>

	appearance of a walled community are strongly discouraged.	other noise sources can be a condition of approval for new subdivisions. This should be recognized in the policy.
8.4.9	New controlled access or gated neighbourhoods or subdivision shall not be permitted.	Infill and intensification sites can require private condominium roads to allow the development of these sites. The target for the Places to Grow density targets will require that condominium development be permitted in the City. This policy is too broad and should be revised. Cluster townhouse blocks with private condominium roads have controlled access and should be continue to be permitted.
	5 minute and 10 minute walking time graphic of the Clair Gordon Node.	This graphic is a helpful tool but is not part of the Official Plan. There should be wording in the Official Plan that recognizes that the higher residential densities surrounding the Mixed Use designations support the commercial uses permitted in this designation.
9.4	Commercial and Mixed-use Designations <i>"live/work opportunities and medium to high density residential uses."</i>	The commercial developers had discussed a concept with the City that these areas be designated as "Commercial" surrounded by higher density residential outside the commercial designation. This would support the commercial uses and walkability and being transit supportive but would not result in people living in the middle of a commercial parking lot. Either the limits of the Mixed Use node should be made larger or the name of the designation should be changed of the commercial node for the existing land area.
9.4.2.2	Implementing Zoning By-laws may include mechanisms, such as minimum height and density requirements and maximum parking standards, to promote the efficient use of the land base.	Proscriptive zoning can make a site unviable to develop. Much time is wasted during the rezoning process negotiating these controls requested by City staff at the last step in the process. Often sites that have been rezoned

		have to come back to revise the zoning again since the market cannot support the restrictions imposed on the zoning.
9.4.2.4	Residential uses are intended to be incorporated into Community Mixed-use Centres through the development of mixed-use buildings or medium or high density housing.	Residential uses should be directed to the lands surrounding the Commercial Node in the 5 and 10 minute walk time areas.
9.4.2.6	Community Mixed-use Centres are strongly encouraged to incorporate Main Street type development in strategic locations and will be planned and designed to reflect the following: i) multi-storey buildings fronting onto the main street ; ii) ground floor retail and service uses are strongly encouraged; iii) office uses at ground floor should be limited; iv) residential uses should be provided primarily above commercial uses in addition to some free-standing residential buildings ; v) the width of storefronts should be limited to encourage pedestrian activity along the street; vi) urban squares, where appropriate; and vii) on-street parking.	There seems to be a disconnect between the proposed Official Plan policies and the market realities. If it cannot be implemented is it good public policy and should it be included in the Official Plan?
9.4.2.8	New streets parallel and adjacent to arterial or collector roads are prohibited.	This policy is not clear.
9.4.2.11	Development will be comprehensively planned and integrated with the overall Community Mixed-Use Node and in accordance with any applicable concept plans or urban design studies as per the policies of Section 3.11 .	Section 3.11 should be clear that residential is not required in the implementing zoning.
9.4.2.12	Permitted Uses 12. The following uses may be permitted in Community Mixed-use Centres, subject to the applicable provisions of this Plan: i) commercial, retail and service uses; ii) live/work uses ; iii) small-scale professional and medically related offices; iv) entertainment and recreational commercial uses; v) community services and facilities; vi) cultural, educational and institutional uses;	Residential uses should be directed to areas surrounding the Commercial Node.

	<p>vii) hotels; viii) medium and high density multiple unit residential buildings; and ix) urban squares and open space.</p>	
9.4.2.18	<p>The minimum height is two (2) storeys for buildings fronting onto arterial and collector roads and identified main streets and the maximum height is ten (10) storeys.</p>	<p>The commercial nodes have not been sized to permit 2 to 10 storey buildings. Where are these “main streets” identified in the Official Plan? Usable 2 storey buildings should not be required in the policies. Guelph has not yet achieved the land values to support underground and structured parking. The most intensification will be achieved by single storey buildings with reduced parking requirements. When the Official Plan is reviewed every 5 years this could change over time. Requiring a usable second storey at this time will result in under leased second floors and smaller building coverage with more parking required. This will not support transit or walkability.</p>
9.4.2.19	<p>For freestanding residential <i>development</i>, the maximum <i>net density</i> is 150 units per hectare and the minimum net density is 100 units per hectare.</p>	<p>If medium density is permitted within the designation ie. townhouses, how will the minimum density of 100 units per hectare be achieved? What is the intent of this policy?</p>
9.4.2.21	<p>Underground or structured parking is encouraged.</p>	<p>Underground or structured parking is expensive to provide in this market and is not supported by the current land values.</p>
9.4.2.22	<p>Surface parking should generally be minimized, well landscaped and is subject to the Urban Design policies of this Plan.</p>	<p>What does “minimized” mean? Less than the parking required by the Zoning By-law?</p>
9.5.2.3	<p>Industrial Warehousing and indoor bulk storage of goods will primarily be directed to locate on industrially designated lands within the built up area where there is convenient access to the Hanlon Expressway or rail lines.</p>	<p>Warehousing should be primarily directed to the lands which are designated and zoned to permit Warehousing which includes the lands along the Hanlon Expressway with convenient access in the Greenfield Area.</p>
9.5.2.16	<p>A minimum height of 2 storeys is encouraged.</p>	<p>Warehouses are typically 28 to 40 feet clear height but are only single storey except potentially the office portion which may be 2</p>

		storeys. This should be clarified in the proposed Official Plan policy.
9.5.2.17	The City shall plan to achieve an average density of 36 jobs per hectare on lands designated Industrial in the <i>greenfield</i> area.	The only Provincially mandated target for Greenfield Areas is the overall density target of 50 persons and jobs per hectare. Other municipalities updating their Official Plans have been using the combined jobs and persons target provided by the Province. They have not included a jobs only target for their employment lands. Guelph should also use this approach and delete the jobs only target from the Official Plan. It is not achievable.
9.5.2.18	18. <i>Development</i> with densities of 36 jobs per hectare or more are highly encouraged to locate within the <i>greenfield</i> area.	
9.9	Special Study Areas The Special Study Areas designation applies to the following areas as identified on Schedule 2:	Reserve lands south of Clair Road should be included as a Special Study Area.
9.10.3	Clair-Maltby 1. The Reserve Lands designation is applied to lands in the south of Guelph generally located south of Clair Road and north of Maltby Road. These lands form part of the longer term urban land supply to 2031 and beyond . 3. The redesignation of Reserve Lands to other land use designations will be considered through a Secondary Plan. The Secondary Plan will address the issues outlined in Section 10.2 of this Plan and will consider: i) whether City population and household forecasts justify the need for incorporating such land as part of the City's unconstrained short to medium term land supply; and ii) whether additional residential and non-residential lands are required and the basis for the requirement.	<p>The need for these lands was established in 1993 when these lands were annexed into the City of Guelph.</p> <p>The Places to Grow population target be met by 2031 without these lands.</p> <p>The Secondary Plan should be initiated immediately for the Clair-Maltby lands.</p>

KILMER BROWNFIELD MANAGEMENT LIMITED
SUITE 2700, SCOTIA PLAZA
40 KING STREET WEST, BOX 127
TORONTO, ONTARIO M5H 3Y2

April 2nd, 2012

Blair Labelle
 City Clerk
 City of Guelph
 1 Carden Street
 Guelph, ON N1H 3A1

Dear Mr. Labelle

Re: City of Guelph Official Plan Update Phase 3 (OPA 48)

We, Kilmer Brownfield Management Limited (Kilmer), managers of Arthur EMPC Four Limited, and owners of 5 Arthur Street South, Guelph, respectfully offer comments and seek clarification with respect to the following draft policies which form part of Official Plan Amendment #48 specifically with regard to Section 4.4.4 Potentially Contaminated Properties.

- Objective d) states that it is the objective of the Official Plan to *“ensure contaminated properties are remediated to appropriate Provincial or risk-based standards...”*

Kilmer notes that Ontario Regulation 153/04 (as amended by 511/09) of the Environmental Protection Act requires that properties meet either Generic Site Condition Standards or Risk Based Standards associated with the intended land use. Both standards are equally recognized as being Provincial Standards under the regulation. Kilmer suggests that the wording of Objective d) be revised to read as follows:

“To ensure that development properties are assessed and if necessary remediated in accordance with the proposed use and follow the requirements as set out in Ontario Regulation 153/04 (as amended by 511/09) of the Environmental Protection Act or as amended from time to time, which includes the option for either generic or risk based standards.”

- Objective a) states that it is the objective of the Official Plan to *“encourage and facilitate safe redevelopment of contaminated sites.”* Objective e) similarly reads *“to promote the redevelopment, restoration and revitalization of land and buildings located on potentially contaminated sites.”*

Kilmer notes that both Objective a) and e) are similar and suggests that Objective e) be deleted and Objective a) be revised to read as follows:

“To promote the redevelopment, restoration and revitalization of land and buildings located on potentially contaminated sites and contaminated sites.”

- Policy 1 states *“The following list represents current or past activities on a property that may cause or that may have caused environmental contamination:..”*

Kilmer notes that Column A of Table 2 of Schedule D contained in Ontario Regulation 153/04 (as amended by 511/09) of the Environmental Protection Act provides a comprehensive list of

potentially contaminating activities. Kilmer requests that revisions be made to reference this table to align the City's policies with the regulation.

- Policy 2 and Policy 3 i) require proponents of development to either “*document previous uses of a property or properties...*” or “*to submit a Phase I or Phase II Environmental Site Assessment...*”

Kilmer notes that the intent of Policy 2 and Policy 3 i) appear to be similar in nature. Kilmer suggests that Policy 3 be deleted and Policy 2 be reworded to read as follows:

“In accordance with O.Reg 153/04(as amended by 511/09)of the Environmental Protection Act or as amended from time to time, the City may require proponents of development to verify that a Phase I and/or a Phase II Environmental Site Assessment has been completed for a property or properties that are subject to a development application. The environmental site assessment(s) will be prepared:

i)In accordance with regulations and standards contained in Ontario Regulation 153/04 (as amended by 511/09)of the Environmental Protection Act or as amended from time to time.”

- Policy 4 states that “*the City will use all available information during the development application review process...to help ensure that development takes place only on properties where environmental conditions are suitable or have been made suitable...*”

Kilmer notes that *Ontario Regulation 153/04 (as amended by 511/09)of the Environmental Protection Act* has been established to ensure that properties with environmental issues are remediated to appropriate standards necessary to protect the health of humans and the natural environment. Kilmer requests that this policy be revised to read as follows:

“The City will assess all available information during the development application review process to verify that potentially contaminated properties are suitable or have been made suitable for the proposed use of the property in accordance with Ontario Regulation 153/04 (as amended by 511/09) of the Environmental Protection Act or as amended from time to time.”

- Policy 5 states that “*Prior to any development approval being given on a property identified by the City as potentially contaminated...*”

Similar to our second comment, Kilmer suggests that this policy be revised and the City adopt the Phase I and Phase II Environmental Site Assessment which includes a detailed assessment of potentially contaminating activities found in Ontario Regulation 153/04 (as amended by 511/09) of the Environmental Protection Act.

- Policy 7 states that “*Where the City determines that an independent peer review of the Environmental Site Assessment(s) is required..*”

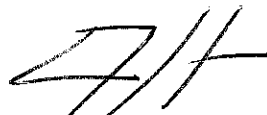
Kilmer requests clarification regarding Policy 7. Under what circumstances would City staff determine that a peer review is required? These circumstances should be listed to provide clarity (e.g. land conveyance).

Thank you for considering our comments and our request for clarification on the above noted policies that form part of draft OPA 48 and the City's Official Plan Review. We feel that our suggested changes will provide greater clarity regarding the redevelopment of environmentally impacted properties, including Brownfields, and will be consistent with Provincial policy which regulates the redevelopment of environmental impacted properties.

Yours truly,

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Nikolas Papapetrou
Project Coordinator
Kilmer Brownfield Management Limited

A handwritten signature in black ink, appearing to read 'DH' followed by a stylized surname.

David Harper M.Sc., P.Geo
President
Kilmer Brownfield Management Limited



64 Jardin Drive, Unit 1B
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 F. 905.669.0097
klmplanning.com

File: P-1865

April 2, 2012

City of Guelph
 1 Carden Street
 Guelph, Ontario
 N1H 3A1

Attention: Mr. Blair Labelle
City Clerk

Re: City of Guelph Official Plan Update (OPA 48)
Guelph Watson 5-3 Inc.
c/o Metrus Development Inc.
Part of Lot 5, Concession 3
City of Guelph

Dear Mr. Labelle:

KLM Planning Partners Inc. acts on behalf of Guelph Watson 5-3 Inc. in relation to their lands located on the north and south side of Starwood Drive, immediately west of Watson Parkway North along with a small parcel of land on the east side of Watson Parkway.

On behalf of Guelph Watson 5-3 Inc. we submitted an Official Plan Amendment application, Zoning By-law Amendment application and a Draft Plan of Subdivision application to the City of Guelph on August 31, 2011. Coincidentally, our public meeting is also scheduled for the same evening as the draft City of Guelph Official Plan. The submitted applications are to permit the following:

1. Redesignate the subject land from "Industrial" to "Mixed Use Node";
2. Rezone the subject land from "B.1 Industrial" Zone to a mix of zones that reflects the Draft Plan of Subdivision; and,
3. To permit a mix of street related townhouses, stacked townhouses, a commercial block, a parkette and recognize the existing library.

Further to our application submission and comments provided in writing to Ms. Marion Plaunt and dated March 31, 2010 as it relates to the City of Guelph Official Plan Amendment (then noted as OPA No. 42 and now OPA 48), our concerns continue to be as follows:

1. The draft land use schedule continues to propose three different land use designations for the Guelph Watson 5-3 Inc. lands on the north side of Starwood Drive, including High Density Residential, Medium Density Residential and Community Mixed Use Centre.

It continues to be our opinion that given the size (approx. 5.5 hectares excluding the library), configuration and the recently constructed library, it is our opinion the City is continuing to try and “shoe horn” too many land uses onto a small parcel of land.

The draft Official Plan sets out a maximum retail floor space for the “Watson Community Mixed Use Node Area” at 28,000 square metres. This is a continuation of the policy in the existing City of Guelph Official Plan. As noted in our earlier correspondence, we understand that Loblaws is planning on utilizing approximately 11,800 square metres which continues to leave a residual of 16,200 square metres of commercial floor area.

If the Guelph Watson 5-3 Inc. lands were to be developed exclusively with retail uses, at approximately 20% coverage it would only yield an estimated 11,000 square metres of retail floor space. It would seem as though the retail targets set for this node cannot be achieved and continue to be in direct conflict with the higher density residential development that is noted in the draft land use schedule.

2. The draft Official Plan continues to include a High Density Residential designation on the Guelph Watson 5-3 Inc. land. It continues to be our opinion this is not an appropriate location given that it is not adjacent to a major intersection, has limited transit opportunities in the area and is not compatible with the surrounding community which consists largely of single detached dwellings.
3. Based on the submission of our applications, it is our opinion the Guelph Watson 5-3 Inc. lands are better suited to be designated solely as Community Mixed Use Centre. However, the minimum density provision for the Community Mixed Use Centre designation for freestanding residential development is much too high which is set at a minimum of 100 units per net hectare.

Given that the Medium Density designation has a minimum density range of 35 units per hectare (minimum) to 100 units per net hectare (maximum) we feel the more appropriate range for the Community Mixed Use Centre designation is a minimum of 50 units per net hectare and a maximum of 150 units per net hectare. This density range will allow greater flexibility in the variety of housing forms that can be constructed in the Community Mixed Use Centre designation.

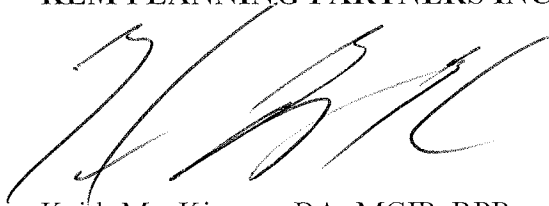
4. As a general comment, the draft Official Plan continues to set height limitations. In our opinion the height limitations should be removed, given this is typically and more appropriately dealt with through an implementing Zoning By-law.

Based on the above, it remains our opinion the Guelph Watson 5-3 Inc. land is better suited to develop with only the Community Mixed Use Centre designation and the remainder of the land which is proposed to be designated as Medium Density Residential and High Density Residential should be removed.

We trust our comments will be addressed in the subsequent draft of the Official Plan and we request to be notified of any decision Council makes on this matter.

Yours very truly,

KLM PLANNING PARTNERS INC.

A handwritten signature in black ink, appearing to read 'K MacKinnon', is written over the company name.

Keith MacKinnon, BA, MCIP, RPP
Partner

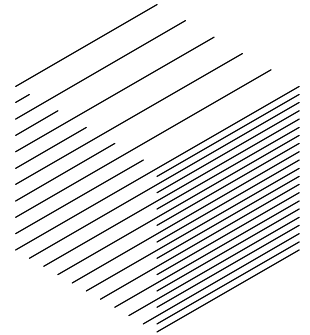
cc. Mr. Fraser Nelson – Metrus Development Inc.
cc. Mr. Peter Murphy – Metrus Development Inc.

**Walker, Nott, Dragicevic
Associates Limited**
Planning
Urban Design

April 2, 2012

City of Guelph
Community and Development Services
1 Carden Street
Guelph, ON
N1H 3A1

Attention: Mr. Todd Salter, MCIP, RPP
Acting General Manager, Planning Services



Dear Sir:

**Re: Guelph Official Plan Review
Draft Official Plan Amendment No.48
Our File 10-529**

90 Eglinton Avenue East
Suite 701
Toronto, Ontario
M4P 2Y3
Tel. 416/968-3511
Fax. 416/960-0172
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web: www.wndplan.com

As you are aware, we act as planning consultants to Armel Corporation with regards to several of their land holdings in the westerly area of Guelph. Further to our recent meeting with City staff, we are taking this opportunity to provide some preliminary comments with respect to the most recent draft Official Plan ('OPA 48').

Mixed Use Nodes and Community Mixed Use Centre Designation

As discussed at our meeting, Armel has a number of concerns regarding the policies related the 'Mixed Use Node' (which is an urban structure component of the Official Plan) and the Community Mixed Use Centre designation (which is a land use designation).

The intent of the 'Mixed Use Nodes' ('MUN') is to identify areas of the City wherein a more diverse and compact arrangement of land uses are intended to provide a focal points for intensified, mixed use development within the City. As such, the 'Mixed Use Nodes' encompass a number of properties and most importantly, a number of different, specific land use designations within a 5 - 10 minute walking distance of the Node's centre.

In contrast, the 'Community Mixed Use Centre' ('CMUC') is a specific land use designation applied to individual properties. This designation primarily arose from the City's earlier commercial policy review (OPA 29) and subsequent OMB decision regarding the Silver Creek lands. We understand that CMUC's form an integral (primarily commercial) component of the larger MUN's, with the intention than MUN's also generally capture surrounding multi-residential, community and other land use designations.

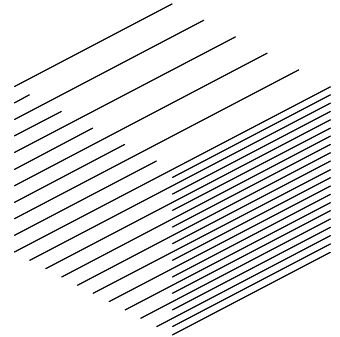
Peter R. Walker, FCIP, RPP
Wendy Nott, FCIP, RPP
Robert A. Dragicevic, MCIP, RPP
Senior Principals

Andrew Ferancik, MCIP, RPP
Senior Associate

Martha Coffey
Controller

In this regard, the 'Community Mixed Use Centre' designation forms one of a number of land use designations that may be found within the 'Mixed Use Node'.

Accordingly, in order to clarify the purpose and intent of the MUN, additional policy should be considered in order to clarify to policy intent of the larger areas considered as MUN's relative to the more concise boundaries of the CMUC's. At present, due in part to the cross-referencing of Section 3.11 (MUN) within Section 9.4.2 (CMUC), there is the potential for a conclusion to be reached that the CMUC designation represents the MUN. Our discussion regarding 'urban squares' under the CMUC policies as opposed to the MUN policies is an example of where such clarification would be of assistance in the implementation of these policies.



Further, there should be some policy flexibility to recognize that some MUN's are already nearly fully developed, while others have not yet developed, or are only partially developed. The policy should positively encourage and enable undeveloped MUN's to mature. Policies which are prescriptively regulatory should be eliminated or adjusted to provide the flexibility necessary to encourage and enable build out of MUN's in all parts of the city, on an equal footing. Building height and usability, parking fields and assignments, store front widths, and building massing are examples of prescriptive policy that can be problematic if contained within an official plan, such that what should be guidelines in effect become regulation.

We also discussed the need to clarify the floorspace assignments in CMUC's (in particular, the Paisley/Imperial CMUC) in order to ensure consistency with intent of OPA 29.

Other Commercial Designations

In addition to the Paisley/Imperial node, Armel owns many other commercial properties around the city identified as Service or Neighbourhood Commercial, or Mixed Use Corridor, and many of the comments listed above apply equally to these other land use designations.

Schedules

As discussed, we would request that the following matters relating to the OPA 48 schedules also be considered:

- Schedule 8: the existing pedestrian trail linkage should be shown leading to the Hanlon corridor from Silvercreek Parkway near Greengate.
- Schedule 2: the Natural Heritage System denotation at the westerly edge of the city, just south of Paisley Road, should be clarified.

- Various Schedules: a number of schedules indicate a re-aligned Whitelaw Road and/or the closure of the northerly portion of the existing Whitelaw Road (Schedule 7); as no formal approval of this road re-location/closure has occurred, these matters should not be included on the various schedules.

Concluding Remarks

Armel will continue to work collaboratively with the City staff with respect to draft OPA 48 and will provide more detailed comments. We would be happy to meet with you to discuss these comments and please do not hesitate to contact the undersigned with respect to any of the comments raised herein.

Yours very truly,

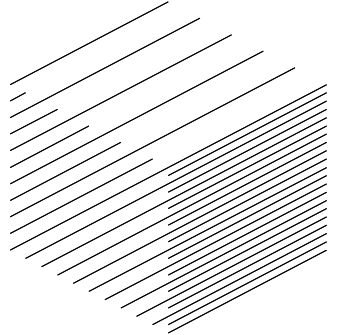
WALKER, NOTT, DRAGICEVIC ASSOCIATES LIMITED

Planning · Urban Design

A handwritten signature in dark ink, appearing to read "Wendy Nott". The signature is fluid and cursive, with the first name "Wendy" and the last name "Nott" clearly distinguishable.

Wendy Nott, FCIP, RPP
Senior Principal

cc. C. Corosky, Armel
City Clerk for Members of Council



April 11, 2012

City of Guelph
Community and Development Services
1 Carden Street
Guelph, ON
N1H 3A1

Attention: Mr. Todd Salter, MCIP, RPP
Acting General Manager, Planning Services

Dear Sir:

**Re: Guelph Official Plan Review
Draft Official Plan Amendment No.48
Our File 10-529**

As you are aware, we act as planning consultants to Armel Corporation with regard to several of their land holdings in the westerly area of Guelph. Further to our previous submissions we are taking this opportunity to provide further comments with respect to the draft Official Plan ('OPA 48').

Mixed Use Nodes

As previously noted, Armel has a number of concerns regarding the policies related the 'Mixed Use Node' (which is a 'Growth Plan Element' of the Official Plan) and the Community Mixed Use Centre designation (which is a land use designation).

The intent of the 'Mixed Use Nodes' ('MUN') is to identify areas of the City wherein a more diverse and compact arrangement of land uses are intended to provide a focal point for intensified, mixed use development. Conceptually, an MUN can encompass a number of properties and most importantly, a number of different, specific land use designations. We have reviewed your schedule illustrating this, which suggests an MUN radius based on a 5 - 10 minute walking distance of the Node's centre/main intersection.

We agree with this general depiction of an MUN, and suggest that additional policies be added to Section 3.11.1 to better describe this intent. These additional policies should explain that there will be a number of differing land use designations within the Node (as shown on Schedule 2) and that this diversity of land use designations over a wider area is the means by which the mix of uses will be achieved. Specifically, the 'Community Mixed Use Centre' ('CMUC') designation forms one of a number of land use designations that may be found within the 'Mixed Use Node' (you may wish to list the actual land use designations that will be found within the Node in Section 3.11).

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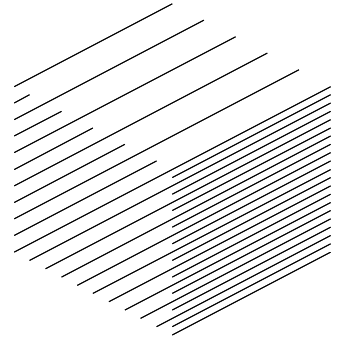
Peter R. Walker, FCIP, RPP
Wendy Nott, FCIP, RPP
Robert A. Dragicevic, MCIP, RPP
Senior Principals

Andrew Ferancik, MCIP, RPP
Senior Associate

Martha Coffey
Controller

This would, in our submission, assist in clarifying that the 'Community Mixed Use Centres' are not the same as the Nodes, but rather that the CMUC is a specific land use designation applied to individual properties within a Node. At present, due in part to the cross-referencing of Section 3.11 (MUN) within Section 9.4.2 (CMUC), there is the potential for a conclusion to be reached that the CMUC designation represents the complete MUN.

As previously noted, there should be some policy flexibility to recognize that some MUN's are nearly fully developed, while others have not yet developed, or are only partially developed. The policy should positively encourage and enable undeveloped MUN's to mature. Policies which are prescriptively regulatory should be eliminated or adjusted to provide the flexibility necessary to encourage and enable build out of MUN's in all parts of the city, on an equal footing.



Community Mixed Use Centre Designation

Similar to the expanded policies for MUNs suggested above, it would be useful under Section 9.4.2.1 and/or Section 9.4.2.2 to explain that the CMUC designation is one of the land use designations that contribute to the achievement of the MUN 'Growth Plan Element'. If this were done, then the cross-referencing of Section 3.11 found in Section 9.4.2.3 would be logical.

Section 9.4.2.10 is another example of the potential for confusion between the CMUCs and the MUNs. In this section, the language refers to the boundaries of the CMUC "... are intended to clearly distinguish the node as a distinct entity." Obviously, the boundaries of the CMUC designation do not equate to the boundaries of the MUN, since the MUN encompasses a larger area and a variety of land use designations.

The section goes on to reference establish of new nodes. This reinforces the potential for confusion in interpreting that the CMUC is the same as the MUN. We would suggest a review of this section with a view to moving policies that are clearly relating to the broader nodes into Section 3.11.

We would further suggest that the reference to residential uses in the CMUC should be one of 'encouraged' (Section 9.4.2.4) recognizing that that higher density residential uses within the MUNs are also achieved by specific residential land use designations in the broader area around each MUN.

As we discussed, Section 9.4.2.6 is particularly confusing. You indicated that the 'Main Street' area of a CMUC is established through the MUN concept plans required under Section 3.11.5 and we would suggest that clarifying language be added to Section 9.4.2.6 in this regard.

In our submission, the Urban Design policies found in Section 8 reflect more than just the “aesthetic character of the site and building design” as referenced in Section 9.4.2.7 and further, the translation of these urban design policies may differ for each of the CMUC areas. We would suggest that this section be re-worded to indicate that “development shall be consistent with the urban design policies of this Plan and any applicable urban design guidelines, while recognizing the unique context of each property designated CMUC.”

Section 9.4.2.9 indicates that the Zoning By-law will prescribe the maximum street frontage occupied by surface parking. However, this quantitative approach to street frontages does not acknowledge the variety of design techniques that can be used to address the interface between surface parking and the street (including the pedestrian realm). We suggest that this section be re-worded as a positive policy directive indicating that the relationship between surface parking areas and arterial roads will be addressed through various means such as streetscape/landscape design, building placement and zoning controls.

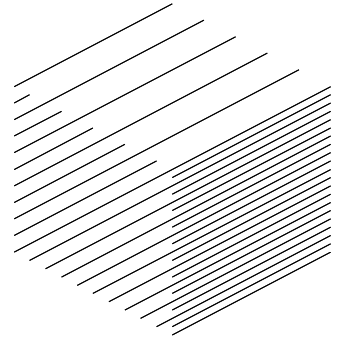
Section 9.4.2.12 indicates that medium density residential uses are permitted within CMUC designations; however, the minimum net density requirement of 100 uph (Section 9.4.2.18) will preclude most medium density dwelling types. There needs to be some rationalization of the medium density residential uses both in terms of density and built-form.

As previously noted, there is a need to clarify the floorspace assignments (Section 9.4.2.17) in CMUC's (in particular, the Paisley/Imperial CMUC) in order to ensure consistency with intent of OPA 29 and we would be pleased to review the various development approvals for this CMUC with you to confirm the appropriate floorspace assignment.

Section 9.4.2.18 indicates a minimum two-storey building height along arterial and collector roads and identified main streets (again, the use of the term ‘main streets’ here should be clarified by cross-referencing back to Section 3.11.5 which states how main streets get established). Depending on intent of the wording of Section 9.4.2.18, this policy has very serious implications.

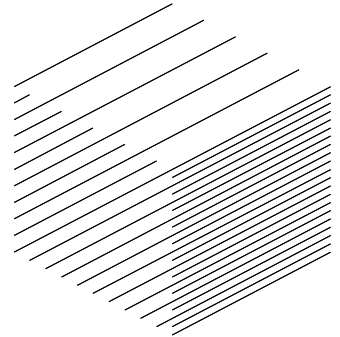
If this purpose of this policy is one of securing appropriate urban design/built form, in our view there are a variety of design techniques (taller building elements, parapets, articulated roof lines, etc.) that can achieve this urban design objective. If the purpose of this policy is to achieve more intensive development, it must be considered in context with current local market reality, as well as other policy objectives of the OP.

Although this proposed policy no longer references two ‘usable’ storeys in buildings along arterial/collector roads adjacent or internal main streets within CMUCs, Armel's concerns are exacerbated if the intent of this policy is, in fact,



to require two usable storeys. Economic demand for second floor space is not evident in the Guelph market at this time and therefore, a prescriptive requirement for there to be at least two usable storeys could preclude or stifle initial development proceeding on these sites in the short term.

We would suggest wording that encourages (but not requires) two storey buildings in these locations and directs taller buildings and/or building elements in key locations as determined by the MUN concept plans (Section 3.11) and/or the applicable urban design guidelines. This way, urban design objectives are achieved in the short term, and over the long term these sites can further develop or redevelop in step with market demand.



Other Commercial Designations

In addition to the Paisley/Imperial node, Armel owns many other commercial properties around the city identified as Service Commercial, Neighbourhood Commercial, or Mixed Use Corridor, and many of the comments listed above apply equally to these other land use designations (e.g. comments on Sections 9.4.2.7- aesthetics, 9.4.2.18 – two storey building height).

Urban Squares

We appreciate the clarification received that, where dedicated to the City, urban squares will form part of municipal parkland dedication requirements under the Planning Act. To make this clear in the document, we suggest that Sections 8.20 and 7.3.5 be expanded to explicitly note that urban squares that are dedicated to the City will be included as parkland dedication.

High Density Residential

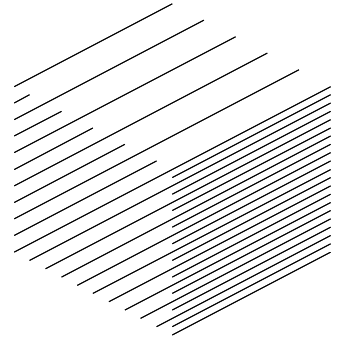
The permitted residential uses in the High Density Residential designation (Section 9.3.5.1) are identified as “multiple unit dwellings generally in the form of apartments”. Since this policy implies that other forms of multiple unit dwelling could be considered, it is suggested that this be stated more explicitly (such as by adding the following “or other residential forms, where it can be demonstrated that desired density is being achieved.”). This would then clearly permit consideration of alternative housing forms such as stacked townhouses.

Further, the High Density Residential policies include a statement that structured and/or underground parking is strongly encouraged. In the Guelph housing market, such parking may not be economically feasible and therefore, we suggest deletion of the word “strongly”.

Schedules

As previously mentioned, we would request that the following matters relating to the OPA 48 schedules also be considered:

- Schedule 8: the existing pedestrian trail linkage should be shown leading to the Hanlon corridor from Silvercreek Parkway near Greengate.
- Schedule 2: the Natural Heritage System denotation at the westerly edge of the city, just south of Paisley Road, should be clarified.
- Various Schedules: a number of schedules indicate a re-aligned Whitelaw Road and/or the closure of the northerly portion of the existing Whitelaw Road (Schedule 7); as no formal approval of this road re-location/closure has occurred, these matters should not be included on the various schedules.



Concluding Remarks

Armel will continue to work collaboratively with the City staff with respect to draft OPA 48 and will provide more detailed comments. We would again be happy to meet with you to discuss these comments and please do not hesitate to contact the undersigned with respect to any of the comments raised herein.

Yours very truly,

WALKER, NOTT, DRAGICEVIC ASSOCIATES LIMITED

Planning · Urban Design

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April 2, 2012

Guelph City Hall
1 Carden Street
Guelph, Ontario
N1H 3A1

Attention: Todd Salter, General Manager, Planning and Community Services

Re: **Envision Guelph OPA No. 48 – Released January 30, 2012**
Part of Lot 11, Concession 7
(Geographic Township of Puslinch) City of Guelph
Reference Plan 61R-7440
Garibaldi Holdings Limited, Clair Road West

We are the solicitors for the owners of the above-referenced Garibaldi Holdings Limited ("Garibaldi") property. This property is approximately 27 acres in area. In 1997, Garibaldi previously sold a portion of their adjacent lands to Denso Sales Canada, Inc.. This automobile parts manufacturer continues to operate on the neighbouring property located on Southgate Drive and Clair Road West.

Current Official Plan

The current City of Guelph Official Plan (November 2006 Consolidation) Schedule 1 – LAND USE PLAN designates the 27 acres owned by Garibaldi as "Industrial" with a "Non-Core Greenland Overlay" on portions of the property. The Non-Core Greenland Overlay takes on the underlying land use designation with an accepted EIS and may be developed for industrial purposes.

TURKSTRA MAZZA ASSOCIATES, LAWYERS

Envision Guelph OPA No. 48 (Released January 30, 2012)

The Draft Envision Guelph document in Draft Schedule 2: Land Use Plan proposes to remove the existing "Industrial" designation from the Garibaldi Property and replace it with a "Significant Natural Area" and "Natural Area" designation. The remaining "Industrial" designation in OPA No. 48 on the Garibaldi Property is in an isolated location with no road frontage. This onerous change in designation is not acceptable to Garibaldi and it has a direct impact on the interests of our client.

We request that Council direct staff to reinstate the "Industrial" designation on the entire Garibaldi Property in the final version of OPA No. 48 which will be presented to Council for approval.

Please provide us with notice of any upcoming meetings and further drafts of the Official Plan being released. We would like to meet with you to review our position with respect to this issue.

Yours truly,

A handwritten signature in black ink, appearing to read 'Shelley Kaufman', with a stylized, cursive script.

Shelley Kaufman

cc: Mayor Farbridge and Members of Council
Peter Cartwright, Economic Development

(1204.Envision Guelph Comments.doc)

Ministry of
Municipal Affairs
and Housing

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March 21, 2012

Ms. Melissa Aldunate, M.P.I, MCIP, RPP
Senior Policy Planner
Planning & Building, Engineering and Environment, Policy Planning
City of Guelph
1 Carden Street
Guelph, ON N1H 3T9

Dear Ms. Aldunate,

**Re: Proposed Official Plan Amendment No. 48
Phase III of Official Plan 5 Year Review
City of Guelph**

Thank you for your recent circulation of the above-noted matter.

It is understood that the proposed Official Plan Amendment No. 48 is the third and final phase of the City's comprehensive Official Plan update. Phase one of the update was approved by the Ministry in 2009 (Official Plan Amendment No. 39) and established a growth management framework for the City to the year 2031. Official Plan Amendment No. 42 was approved by the Ministry in 2011 (Official Plan Amendment No. 42) and has been appealed to the Ontario Municipal Board. Official Plan Amendment No. 42 proposes to replace the existing Core and Non-Core Greenlands policies and mapping contained within the City's Official Plan with a Natural Heritage System (mapping and policies) in order to achieve consistency with the Provincial Policy Statement, 2005; maintain conformity with the Growth Plan for the Greater Golden Horseshoe; and have regard to matters of provincial interest. Official Plan Amendments No. 39 and 42 apply to all lands within the municipal boundaries of the City of Guelph.

Official Plan Amendment No. 48 proposes to amend, update or provide new policies with respect to:

- strategic directions and vision to guide growth to the year 2031;
- achievement of the City's growth management framework;
- urban design consistent with the Urban Design Action Plan;
- land use designations;
- the City's Community Energy Plan;
- transportation providing greater focus on transit, walking and cycling;
- implementation and the use of planning tools associated with height and density bonusing, the regulation of exterior building design through site plan control and the introduction of a development permit system; and
- the following additional topic areas: watershed planning and water resources; municipal services and infrastructure; mineral aggregate resources; public health and safety,

including natural and human-made hazards; cultural heritage resources; municipal services; affordable housing; and parks and trails.

Section 26 of the *Planning Act*, as amended, states that before the City of Guelph adopts the policies contained in Official Plan Amendment No. 48, the City needs to be satisfied that the policies are consistent with the 2005 Provincial Policy Statement and conforms with provincial plans. The City of Guelph falls within the jurisdiction of the Growth Plan for the Greater Golden Horseshoe.

The comments provided below are being offered for the City's consideration. If/when comments are received from the Ministry of Natural Resources, they will be provided under separate cover.

Ministry of Infrastructure (MOI)

MOI offers the following comments for the City's consideration.

The City's Official Plan Amendment 39 (OPA 39) for conformity with the Growth Plan was approved by MMAH in 2009 and is in effect. MOI notes that the policies in the draft official plan, as circulated, do not appear to have changed from those in OPA 39, save and except for some slight reorganization and minor wording changes.

MOI commends the City on a progressive draft official plan that captures the Growth Plan's vision for the Greater Golden Horseshoe. In particular, MOI is supportive of the following policies in the draft official plan:

- Preparing a development priorities plan to manage and monitor growth, and to define and prioritize the rate, timing and location of development in the City;
- Using a multi-modal approach to transportation planning with an emphasis on walking, cycling and transit;
- Planning to achieve greater energy conservation, identifying opportunities for alternative energy sources, and using land-use patterns and urban design standards to address climate change;
- Developing a suite of City-wide urban design policies that supports a pedestrian friendly urban environment and transit-supportive development.

Please find attached (Appendix A) suggestions and technical comments from MOI for the City's consideration. As MOI is supportive of the draft official plan, as circulated, the attached suggestions are meant to be helpful as the City develops and implements the plan.

Ministry of Transportation (MTO)

MTO notes one provincial highway lies within the City of Guelph boundary. Highway 6 (Hanlon Expressway) is classified as a freeway.

MTO is in the process of completing the detail design for an interchange at the Laird Road intersection in order to provide access to the South Guelph industrial lands on the east side of the highway and the Hanlon Creek Business Park on the west side of the highway. MTO and the City have partnered for the design and construction of this interchange and construction is expected to begin next month. MTO recommends this interchange be shown on all of the land use schedules.

In addition to the Laird Road interchange, please be advised MTO has received approval for an Environmental Assessment that was undertaken on the Hanlon corridor. This assessment evaluated existing and future requirements and determined appropriate locations for interchanges. MTO is beginning the process of identifying the required properties for future construction. The outcome of this process will have an impact on some of the lands located

along Highway 6 that are currently designated in the official plan for a number of land uses, including residential, commercial and industrial. The City may wish to consider identifying these lands on Schedule 5, Development Constraints. The City is also encouraged to show the proposed new interchanges locations on all the land use schedules.

Further, MTO notes there are no specific or general policies in the draft document relating to transportation. MTO recommends the following statement be included somewhere in the OP, preferably in Section 5, Movement of People and Goods and/or Section 9, Land Use:

"In addition to all the applicable municipal requirements, all proposed development located adjacent to and in the vicinity of a provincial highway within MTO's permit control area under the Public Transportation and Highway Improvement Act (PTHIA) will also be subject to MTO approval. Early consultation with the MTO is encouraged to ensure the integration of municipal planning initiatives with provincial transportation planning. Any areas in the municipality identified for future development that are located adjacent to or in the vicinity of a provincial highway or interchange/intersection within MTO's permit control area will be subject to MTO's policies, standards and requirements. Direct access will be discouraged and often prohibited."

Finally, MTO notes the roads shown on Schedule 7 (Road and Rail) are not labelled. MTO suggests the roads on Schedule 7 be labelled, especially Provincial Highway 6 (Hanlon Expressway). Further, MTO notes the legend on Schedule 7 identifies Highway 6 (Hanlon Expressway) as "Expressway". MTO suggests this be changed to "Provincial Highway".

Ministry of Tourism, Culture and Sport (MTCS)

MTCS has reviewed the Cultural Heritage Resources policies and offers the following comments for the City's consideration.

Section 4.8 Cultural Heritage Resources

Section 2.6 of the Provincial Policy Statement requires municipalities to conserve significant built heritage resources and significant cultural landscapes. MTCS notes the objectives contained in Section 4.8 use the word 'encourage'. To be consistent with the PPS, MTCS recommends the word 'encourage' be replaced with stronger language.

Section 4.8.1 Cultural Heritage Policies

Subsection 4.8.1 (7) speaks to the ongoing maintenance and care of individual built heritage resources and cultural heritage landscapes. MTCS also notes this same policy contains the word 'encourage'. MTCS recommends this policy be revised to indicate/include that "harmful disruption or disturbance" of archaeological sites is illegal without an archaeological license to alter a known archaeological site(s) under the *Ontario Heritage Act*.

In addition, MTCS notes the last sentence subsection 4.8.1 (15) states the City may use or dispose of demolished cultural heritage resources as it deems appropriate. MTCS questions whether the City can dispose of demolished cultural heritage resources at its discretion. MTCS is of the view that the City's disposal or use of demolished cultural heritage resources needs to occur in accordance with the Ontario Heritage Act and/or its regulations/guidelines.

Further, subsection 4.8.1 (17) speaks to the disposal by sale, lease or otherwise of any real property or interest artifacts acquired under policy 4.7.2.17. In addition to the comment above, if disposal by sale, lease or otherwise was to occur, MTCS suggests such action should be undertaken with Heritage Guelph.

Section 4.8.2 Heritage Designation

Subsection 4.8.2 (6) speaks to the conservation of heritage attributes until such time as the heritage attributes or the designation of the property no longer meet the criteria for determining cultural heritage value or interest established provincial regulation. MTCS supports this policy and recommends it be revised to indicate that removal of the designation needs to occur in accordance with the Ontario Heritage Act and its regulations/guidelines.

Section 4.8.6 Archaeological Resources

MTCS recommends the word 'prehistoric' in subsection 4.8.6 (1) be deleted and replaced with 'precontact'.

In addition, subsection 4.8.6 (4) states that development and site alteration shall not commence on lands containing archaeological resources or areas of potential archaeological resources until an Archaeological Assessment, prepared to the satisfaction of the Province and the City, has been completed that: v) includes a completed archaeological site registry form in instances where archaeological sites are registered. MTCS recommends subsection v) be deleted because it may conflict with the archaeological licensing requirements.

Sections 5, 6 and 7 Transportation, Infrastructure and Urban Design, Respectively

MTCS suggests Sections 5, 6 and 7 of the City's Official Plan be re-visited to ensure transportation, infrastructure and urban design activities being undertaken are consistent with Section 2.6 of the Provincial Policy Statement. To avoid duplication, the City may wish to consider cross-reference the Cultural Heritage policies in Sections 5, 6 and 7.

Ministry of Northern Development and Mines (MNDM)

The Ministry of Northern Development, Mines and Forestry planning interests are related to the protection of long-term mineral resource supply (Section 2.4 PPS) and to the protection of human health and safety (Section 3.2 PPS). Based on their review, MNDM has no concerns with Phase III of the Official Plan Update.

It is also important to note that published reports and maps are available for viewing or free download through the Geology Ontario portal using the following link:

<http://www.geologyontario.mndmf.gov.on.ca/>.

Ministry of the Environment (MOE)

In addition to the proposed revisions, MOE also reviewed sections of the draft official plan that pertain to the mandate, legislation, guidelines and procedures of their Ministry. MOE offers the following comments for the City's consideration.

Section 4.4.3 Landfill Constraint Area

MOE recommends a minor modification to subsection 4.4.3 (2) so that it reads as follows:

- "2. Lands which were used for waste disposal within the last 25 years require an approval from the Minister of the Environment, pursuant to Section 46 of the *Environmental Protection Act* to enable the land to be used for another purpose. Adequate technical assessment must accompany a request for such approval to demonstrate that the future use will neither pose a health and safety hazard nor adversely effect the natural environment. Required approvals pursuant to the *Planning Act* will not be issued unless a Section 46 approval is granted."

Movement of People and Goods – An Integrated Transportation System (Chapter 5)

Chapter 5 contains policies designed to make the City's transportation system more efficient, environmentally sustainable and broaden the use of non-traditional means of transportation. MOE applauds the policies, as drafted, and suggests a reference to the environmental assessment requirements be included with respect to municipally-led projects that are either transit-related or involve the municipal road network. With respect to public transit, please be advised the operative legislation is Ontario Regulation 231/08 which outlines a streamlined environmental assessment process for eligible public transit related projects being undertaken by a municipality. Similarly, the MEA Class Environmental Assessment also addresses municipal transit projects. On this basis, MOE suggests it would be appropriate to include a reference these regulatory requirements in the official plan, noting there is a reference on page 119 which speaks to the coordination of the City's transportation network among various levels of government.

Section 6.7 Termite Control

MOE notes the reference to "Termite Control Officer" indicates that this individual will be providing instruction as to the methods that are to be used for the eradication of termites in soil and building refuse in order to control the spread of termites within the City. It is not clear to MOE whether the position of "Termite Control Officer" requires this individual to hold a valid Termite Exterminator License, pursuant to the Pesticides Act. Without a license, the Termite Control Officer is limited in his scope of authority and more specifically, cannot direct a licensed exterminator to undertake any actions which could be in contravention of applicable legislation. Please be advised extermination methods and all aspects of application (material used for extermination, method of application, rate of application etc.) can only be determined and executed by a licensed exterminator.

Ministry of Municipal Affairs and Housing (MAH)

Section 3.21.2 Development Priorities Plan

Section 3.21.2 (1) states the City will prepare a Development Priorities Plan on an annual basis to manager and monitor growth and to define and prioritize the rate, timing and location of development in the City. Subsection iii) states the Development Priorities Plan will set an annual limit for the creation of potential dwelling units from registered plans of subdivision. It is unclear how the City will ensure a limit for the creation of potential dwelling units is not exceeded without the potential for appeals to the Ontario Municipal Board.

Section 4.3.3 Source Protection

Section 4.3.3 contains draft policies regarding source water protection. The policies recognize a Source Protection Plan is being developed by the Lake Erie Source Protection Committee. Further, the draft policies states that once approved by the Ministry of the Environment, the Source Protection Plan policies will be incorporated in the City's Official Plan.

Section 4.3.3.1 states that the entire City area is considered to be a recharge area for municipal drinking water supply. To protect this resource the City proposed to introduce conditions of development approval that: "iii) prohibit the extraction of mineral aggregates in significant groundwater recharge areas".

It is important to note the extraction of mineral aggregates in source water protection areas has not been identified as a significant threat by the *Clean Water Act*. Further, the extraction of mineral aggregates within source water protection areas is currently a matter before the Ontario Municipal Board with respect to similar policies adopted by the Region of Waterloo. Before adopting any policies placing restrictions and/or limitations on mineral aggregate operations, the City is encouraged to consider the significant threats contained in the *Clean Water Act*.

In addition, subsection 4.3.3.1 (iv) speaks to the handling of liquid waste, petroleum, fuels, solvents, fertilizers and related chemicals. As stated in our comments dated December 15, 2011 on draft source water protection policies developed by the City, activities such as handling can not be regulated through the *Planning Act*. The Ministry suggests the City ensure the source protection policies can be implemented through the *Planning Act* which control the use of land.

Section 4.4.1 Floodplains

Section 4.4.1 of the draft official plan, as circulated, contains wording revisions and new policies. If the City has not already done so, it is recommended the proposed revisions be circulated to the Grand River Conservation Authority for review and comment.

Section 4.5 Mineral Aggregate Resources

Section 4.5.1 recognizes an existing licensed mineral aggregate operation partially within the City. Section 4.5.1.5 prohibits asphalt plants, concrete plants, aggregate transfer stations and similar related uses within the City of Guelph. It is questioned whether these two policies conflict with each other?

Section 7.2.1 (3) Affordable Housing Targets

MMAH notes Section 7.2.1 (3) states that an additional separate annual target of 6% of all new residential development has been established for social housing. Since the County of Wellington is the Consolidated Municipal Service Manager responsible for the provision of social housing services, it is unclear how the City will encourage the development of new social housing.

Section 10.4 Zoning By-laws

Section 10.4.2 states, "Zoning By-laws may impose one or more conditions related to the use of land or the erection, location or use of buildings or structures. The conditions shall relate to matters set out in the *Planning Act* and conform to the policies of this Plan".

It is understood the above noted policy is in reference to zoning with zoning. Please be advised regulations for zoning with conditions have not developed by the Province and as such, is currently not a *Planning Act* tool available for use.

Section 10.0 Implementation

During the Ministry's approval of Official Plan Amendment 42, it was discovered that the City's Official Plan does not contain a provision allowing City staff to undertake editorial corrections (numbering, spelling etc) without an amendment to the City's Official Plan. The lack of this policy provision resulted in the Province having to issue a decision on Official Plan Amendment No. 42 containing numerous editorial revisions. To avoid this situation in the future, the Ministry suggests the City consider including a provision allowing editorial amendments without an amendment to the City's Official Plan.

Economic Investment

One of the government's priorities is to encourage and stimulate private sector investment in local communities. The City is encouraged to ensure the City's Official Plan contains adequate policies and provisions to promote and encourage economic development.

First Nations

As you are aware, Phase I of the City of Guelph's 5 Year Review (OPA #39) resulted in the City's Official Plan being brought into with the Growth Plan for the Greater Golden Horseshoe. As part of the Ministry's approval process, MMAH staff spoke with representatives from the Six Nations of the Grand River and the Mississaugas of the New Credit who confirmed they had no issues with the proposed amendment. At that time there was a verbal commitment given by

City staff that they would undertake engagement and consultation with First Nation communities for all further amendments regarding the City's 5 Year Review.

Phase II of the City's 5 Year Review (OPA #42 which is currently under appeal) proposes to replace the existing core and non-core greenlands policies and mapping contained within the City's Official Plan with a Natural Heritage System (mapping and policies). Originally the City's intent was to complete their 5 Year Review as part of Phase II however, it was later decided to proceed with the natural heritage system and leave the remaining sections of the Official Plan to a subsequent phase.

It is understood a meeting was held between City staff and the Mississaugas of the New Credit on May 18, 2010. It is also understood a meeting was held between City staff and the Six Nations of the Grand River on May 19, 2010. According to letters dated May 5, 2010 the scope of these meetings were intended to be broad however, what was actually discussed at the meetings is unknown. The Ministry is receipt of an email from the Six Nations of the Grand River to the City of Guelph dated July 21, 2010. The email was written by Joanne Thomas, Land Use Officer, and states, "I talked with Lonny Bomberry the Director of Lands and Resources. It was decided that Six Nations has no comment on the City's Guelph's Official Plan at this time".

With respect to the Mississaugas of the New Credit, an exchange of emails between City of Guelph staff and the Mississaugas of the New Credit was shared with the Ministry. We received no written comments from the Mississaugas of the New Credit.

Further, it has come to the Ministry's attention that the Metis Nation of Ontario has recently expressed an interest in municipal initiatives. More specifically, we understand the Metis Nation of Ontario has sent letters to various municipalities across the Province advising they have an interest in municipal initiatives. In our view, the Metis Nation of Ontario should be treated like any other First Nation community.

To be in a position to issue a decision on Phase III of the City's 5 Year Review, the Ministry needs to be satisfied that adequate engagement and consultation has taken place with First Nation communities. In light of the time that has elapsed since the adoption of Official Plan Amendment No. 42 and subsequent staff changes both at the City level and with First Nation communities, it is recommended the City give consideration to undertaking consultation with the Six Nations of the Grand River, the Mississaugas of the New Credit, the Metis Nation of Ontario and any other First Nations in the area that you may be aware of and which may have an interest in City of Guelph planning matters. With respect to Six Nations of the Grand River, a follow-up phone call confirming their correspondence dated July 21, 2010 still stands may be appropriate.

Finally, the opportunity to review a consolidated working copy of the draft official plan containing the revisions proposed Official Plan Amendment No. 48 (Phase III of the 5 Year Review) has been very helpful. As you are aware, Official Plan Amendment No. 42 is currently a matter before the Ontario Municipal Board, and the draft official plan circulated by the City for review and comment appropriately contained revisions proposed by Official Plan Amendment No. 42. It is understood the scope of the document submitted to the Ministry for approval will be limited to revisions proposed by Official Plan Amendment No. 48 and will in no way infringe on matters before the Ontario Municipal Board.

On behalf of our Ministry, and the other provincial Ministries, thank you for the opportunity to review and provide comments on the proposed Official Plan Amendment. If there are any questions or concerns on these comments, please contact me at (519) 873-4695 or by email at: Dwayne.Evans@ontario.ca

Yours truly,



Dwayne Evans, M.A., MCIP, RPP
Planner
Municipal Services Office – Western

c.c Barb Slattery, MOE (Hamilton)
Heather Doyle, MTO (St.Catharines)
Penny Young, MCL (Toronto)
Tanzeel Merchant, MEI (Toronto)
Mike Stone, MNR (Guelph)
Debbie Laidlaw, MNDM (Tweed)
Erick Boyd, MAH (London)

**Appendix A:
MOI Suggestions and Technical Comments
for the City of Guelph Draft Official Plan**

- Growth Plan policy 3.2.3.2 requires that all decisions on transit planning and investment will be made according to specific criteria such as facilitating improved linkages from nearby neighbourhoods to urban growth centres, major transit station areas, and other intensification areas. While this policy is included in policy 3.15.2 of the draft official plan, it may be helpful for the City to consider identifying the mode(s) of transportation that will serve as this linkage. Such modes could include, for example, transit and/or walking and cycling connections.
- Growth Plan policy 3.2.4.5 requires that municipalities will plan for land uses in settlement areas adjacent to, or in the vicinity of, transportation facilities that are compatible with, and supportive of, the primary goods movement function of these facilities. Similarly, Growth Plan policy 2.2.6.9 encourages municipalities to designate and preserve lands with settlement areas in the vicinity of existing highway interchanges, ports, rail yards, and airports as areas for manufacturing, warehousing, and associated retail, office and ancillary facilities. Draft official plan policy 5.12.2 directs that “development in proximity to these proposed improvements will be designed and integrated such that it does not preclude or negatively affect the proposed transportation network improvement”. While MOI is supportive of policy 5.12.2, the City may wish to consider providing further direction with respect to development in the vicinity of existing transportation facilities in keeping with Growth Plan policies 2.2.6.9 and 3.2.4.5.
- Although parking is not specifically addressed in the Growth Plan, MOI offers the following policy direction for the City’s consideration:
 - To investigate shared parking arrangements between multiple facilities to optimize the staggered nature of demand at different facilities on a time-of-day, weekday/weekend and monthly basis; and,
 - To design surface parking to: 1) support redevelopment and retrofitting, and 2) enable the transition to structured/underground parking as site development evolves.
- To further promote active transportation, the City may wish to include a policy to provide separate dedicated space for cyclists within the road right-of-way, particularly on roads with higher speeds.
- Policy 5.6.1 Road Network, the first line should be corrected from “Road right-of-ways” to “rights-of-way”.
- The definition of “affordable housing” should be in accordance with the definition in the Growth Plan.
- The definition of “built-up area” should reflect the new ministry name, the Ministry of Infrastructure.
- The definition of “settlement area” should be in accordance with the definition in the Growth Plan.
- The definition of “transportation demand management” should be corrected from “polices” to “policies”.

Ministry of
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April 5, 2012

Ms. Melissa Aldunate, M.P.I, MCIP, RPP
Senior Policy Planner
Planning & Building, Engineering and Environment, Policy Planning
City of Guelph
1 Carden Street
Guelph, ON N1H 3T9

Dear Ms. Aldunate,

**Re: Proposed Official Plan Amendment No. 48
Phase III of Official Plan 5 Year Review
City of Guelph**

Further to our comments dated March 21, 2012, we offer the following additional comments for the City's consideration.

Ministry of Natural Resources (MNR)

As you may be aware, MNR previously reviewed and provided comments regarding the natural heritage policies of the OP as part of Phase II of the City's 5 Year Review (OPA #42). In addition to the comments provided, a number of subsequent meetings were held with City staff. The natural heritage policies (OPA #42) were approved by the Province on February 22, 2011 and subsequently appealed to the Ontario Municipal Board by a number of parties. It is understood the natural heritage policies are not part of the Phase III draft and review.

Through MNR's earlier review, preliminary comments regarding the mineral aggregate resource policies were provided to the City. MNR has met with the City a number of times to discuss the comments, and it appears a vast majority of MNR's earlier comments and concerns have been addressed. Notwithstanding this, MNR offers the following additional comments for the City's consideration.

Section 4.3.3 Source Protection

Policy 4.3.3.1(iii), as drafted, proposes to prohibit mineral aggregate extraction in 'significant groundwater recharge areas'. MNR understands the entire City is considered a recharge area, however, it is important to note *significant* groundwater recharge areas do not appear to be mapped or defined in the OP. As such, it is not clear where the proposed prohibition would apply. Notwithstanding this, MNR suggests a broad prohibition on mineral aggregate operations in recharge areas is not warranted and the use of prohibitions is an extreme measure. It is MNR's view that prohibitions preclude 'due process' under both the *Aggregate Resources Act* and *Planning Act*, each of which requires technical studies to be completed to assess the potential impacts of a mineral aggregate operation and determine whether or not it is an

appropriate land use. MNR suggests it would be beneficial to meet with City staff to seek clarification regarding Policy 4.3.3 (iii).

Further and more generally, MNR questions the need for policy 4.3.3.1(iii) when the City has previously stated there remain no mineral aggregate resources available for extraction within the City. It is understood all remaining resource areas have either been developed or been approved to be developed. MNR also notes that aside from policy 4.3.3.1(iii) the City's OP does not otherwise contain policies regarding the establishment of new mineral aggregate operations.

Policy 4.3.3.1(vii) proposes to place restrictions on certain land uses in 'areas of greatest risk to contamination of groundwater resources'. What is not clear from this policy is what or where the 'areas of greatest risk' are located. As drafted, this policy does not seem to be linked to 'sensitive' or 'vulnerable' areas, or the various Wellhead Protection Areas that are identified on Schedule 9. If certain land uses are proposed to be restricted, MNR suggests it should be made clear in the OP where these restrictions are being contemplated. Please note MNR would not necessarily be supportive of restrictions on mineral aggregate related uses, such as asphalt and concrete batching plants, in all areas.

Policy 4.3.3.1(ix) and Schedule 9 identify four types/categories of Wellhead Protection Area – A, B, C and D. MNR notes these areas do not seem to be described or defined in the OP. MNR suggests it would be helpful to include descriptions/definitions for the types/categories of Wellhead Protection Areas.

Section 4.5 Mineral Aggregate Resources

MNR supports policy 4.5.1 which encourages the recovery of mineral aggregate resources in conjunction with development. In particular, MNR has discussed this matter with the City in relation to the Hanlon Creek Business Park which is currently under development. MNR remains open to meeting with the City to discuss opportunities for resource recovery at this site.

Under policy 4.5.2, it is noted the Reserve Lands designation applies to the portion of the existing licensed mineral aggregate operation that falls within the City. MNR suggests the City may wish to consider adding a cross-reference to the Reserve Lands section of the OP and policy 9.10.2.1 which specifically addresses the mineral aggregate operation.

Policy 4.5.4 indicates the City will review and comment on applications for mineral aggregate operations in neighbouring municipalities in consideration of a variety of matters, including impacts on 'any existing or potential groundwater resource areas and on any existing or potential drinking water sources'. MNR suggests it is not clear what would constitute a 'potential' groundwater or drinking water source and how the impact on such sources could be evaluated. It is suggested the references to 'potential' be removed.

Further to comments above regarding policy 4.3.3.1(vii), please be advised MNR does not support the broad, City-wide prohibition on asphalt and concrete plants and similar related uses proposed under policy 4.5.5. MNR suggests this policy should be removed.

In closing, provincial staff would be pleased to meet with City staff to review and discuss our comments prior to adoption. By resolving issues and concerns prior to adoption, the Ministry of Municipal Affairs and Housing will be in a position to make a decision on the above-noted matter in a timely manner.

If there are any questions or concerns on these comments, please contact me at (519) 873-4695 or by email at: Dwayne.Evans@ontario.ca

Yours truly,



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