



May 28, 2019
Our File: 118031

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

Attention: Katie Nasswetter

Re: 360 Whitelaw Road
City of Guelph
Zoning By-law Amendment/OPA
Response Letter

In response to the comments received regarding the Official Plan / Zoning By-law Amendment for 360 Whitelaw Road in the City of Guelph, we offer the following responses for your review and consideration:

DEVELOPMENT ENGINEERING COMMENTS (Dated March 8, 2019)

INFRASTRUCTURE DEVELOPMENT AND ENVIRONMENTAL ENGINEERING

Road Infrastructure:

Comment 1: Whitelaw Road abutting the subject property is designated as a two (2) lane collector road with a rural cross section. The ultimate right-of-way width of Whitelaw Road abutting the property is approximately 20.00 metres. The City is designing and will be reconstructing Whitelaw Road to a full urban cross section. As part of the design exercise, it has been determined that the grading of the road will change as such, the City will not permit access to Whitelaw Road. Engineering Services is requesting that a Holding Zone (H) provision be applied; until Whitelaw Road is reconstructed.

Please note, under section 5.13 table 5.1 of the Official Plan Whitelaw Road has not be identified for a road widening.

Paisley Road abutting the subject property is designated as a two (2) lane arterial road with grass boulevard on both sides, asphalt pavement, curb and concrete sidewalk on the both sides of the street. The ultimate right-of-way width of Paisley Road abutting the property is 30.00 metres therefore no road widening is required.

Response: *Acknowledged.*

Traffic Study, Access, Parking and Transportation Demand Management:

Proposed Driveways on Whitelaw Road

Comment 1: The two proposed driveways must align with the driveways on the east side of Whitelaw Road. The driveway spacing must be sufficient as per City's Development Engineering Manual.

The Terms of Reference for the TIS include sightline analysis at the two proposed driveways and any road improvements to accommodate the site development. However, the sightline analysis is missing. Also missing is the left-turn warrant analysis at the two proposed driveways.

Please note both proposed driveways on Whitelaw Road cannot be built until Whitelaw Road has been reconstructed with a lower vertical road profile and urbanized cross-section. This project has been identified for 2019 and will be funded through development charges. An “H” holding provision will need to be placed on the property as part of the rezoning application until such time when the road reconstruction has been completed.

Response: *As discussed with the City of Guelph, a sightline analysis for the driveway entrances along Whitelaw Road and Paisley Road have been included in the response prepared by Salvini Consulting (dated May 28, 2019).*

TDM comments

Comment 1: The TIS recommended 1.0 parking space per unit is acceptable. Given that the consultant’s field study of the Imperial Towers yielded a demand of 1.07 spaces per unit, TDM staff would recommend more aggressive TDM measures be required before accepting 1.0 per unit, such as: a) car share membership offered to all tenants with at least 2 car share vehicles provided on-site; and b) unbundled parking to give people the option to purchase a space for a set monthly cost that exceeds the cost of a car share membership or monthly transit pass.

Response: *Please see the enclosed Additional Transportation Information response prepared by Salvini Consulting (dated May 28, 2019).*

Municipal Services:

Comment 1: Whitelaw Road and Paisley Road

Existing services within the right-of-way along Whitelaw Road are as follows:

- Servicing are not currently available along the frontage However, once the reconstruction of Whitelaw road is completed services will be available.

Existing services within the right-of-way along Paisley Road are as follows:

- 300mm diameter storm sewer.
- 200mm diameter sanitary sewer.
- 300mm diameter watermain.

The Developer shall be responsible for the entire cost of removing the existing sanitary sewer lateral and the water service lateral. The Developer will also be responsible to pay for the estimated and actual cost of any servicing upgrade including but not limited to; any curb cuts or curb fills if required, prior to site plan approval and prior to any construction or grading on the lands.

Response: *Acknowledged.*

Sanitary Sewer Wastewater Collection System

Comment 1: Sufficient (and adequate) capacity is available in the City’s existing sanitary sewers adjacent to the above noted site, and of the downstream sanitary sewers, to accommodate discharge of sanitary flows, in our system to accommodate the development, for the referenced type development, at the above noted property, for the above noted proposed development, including existing loads (and no sanitary capacity constraints), according to the City’s wastewater collection system sanitary sewer model.

The referenced development would have no significant adverse impact to the City’s downstream sanitary sewers.

Response: *Acknowledged.*

Water Supply and Distribution System

Comment 1: Sufficient (and adequate) capacity is available of the City's existing water supply and distribution system water main pressures, in our system to accommodate the development, for the referenced type development, for the referenced subdivision, at the above noted property, for the above noted proposed development (and no water capacity constraints), can be expected for most scenarios according to the City's InfoWater water model. However, there is potential for marginal water supply pressures in proposed development under certain conditions such as peak hour demand scenario at locations with elevation greater than 346 m height above mean sea level (AMSL) and average day demand scenario at locations with elevation greater than 339 m height AMSL in the existing water system.

Water pressure in the water mains in vicinity of proposed development under certain conditions such as peak hour demand scenario at locations with elevation at 346 m height above mean sea level (AMSL) could range from 38.0 to 42.0 psi (40 psi +/- 2.0 psi) and average day demand scenario at locations with elevation at 339 m height AMSL could range from 47.5 to 52.5 psi (50 psi +/- 2.5 psi) in the existing water system.

The referenced development would have no significant adverse impact to the City's water supply and distribution system according to the City's InfoWater water system model.

Minimum water service size should be 25 mm for residential and all other services sized appropriately for demand based on potentially lower pressures.

Response: *Acknowledged.*

Storm Water Management & Servicing:

Comment 1: As per section 5.5 Geotechnical report by Chung & Vander Doelen, It appears that the groundwater conditions and the data was obtained in March of 2018; which does not represent of the seasonal high groundwater. We ask the Engineer to investigate further and confirm the seasonal high groundwater elevations; please note that as per the City's Development Engineering Manual we require minimum of four seasons of data in order to capture the seasonal variations in groundwater.

Response: *Please see the enclosed Supplementary Information Addendum for the Hydrogeological Study prepared by GM BluePlan Engineering Limited (dated May 24, 2019).*

Comment 2: The proposed infiltration galleries are one of the major component of this development, though we agree with the general approach we ask the Engineer to provide full details of the infiltration galleries with the subsequent submission.

Response: *Additional details related to the proposed infiltration galleries have been provided in the revised Functional Servicing Brief (dated May 27, 2019).*

Comment 3: In regards to the roof top storage, we understand that the Engineer may not have the final roof design. We ask the Engineer to clarify and confirm if six weirs are proposed per drain it will be considered as a no flow control feature. What will be (if any) the increase of flow rate? If there is no storage, there will be a greater overflow, which may increase the runoff rate further clarification is required from the consultant.

Response: *The analysis of the revised conceptual design layout does not include the use of rooftop storage controls. As part of the detailed engineering design of the site, the use of rooftop storage may be utilized. Should the use of rooftop storage be proposed as part of a detailed engineering design submission, further details will be provided with respect to the number of drains, and number of weirs per drain.*

Comment 4: We disagree with the provided water balance; although it's proposed to meet the pre-development conditions it is unclear how the increase in runoff is captured. Please refer to the comments provided by City's environmental planner. Site-specific monthly water balance calculations shall be completed using the water balance method developed by Thornthwaite and Mather (1957) as documented in the MECP Stormwater Management Planning and Design Manual (2003), as updated from time to time. Please provide the City with the excel sheet of the water balance.

Response: *The water balance analysis has been updated. A copy of the updated water balance analysis has been included in the revised Functional Servicing Brief. A digital copy of the water balance calculation sheet has also been provided.*

Comment 5: Stormwater management will be further examined and comments will be provided once the stormwater management design has been updated.

Response: *Acknowledged.*

Environmental:

Comment 1: City staff reviewed the following report prepared by GM BluePlan Engineering (GMBP) for Armel Corporation:

- "Phase One Environmental Site Assessment Paisley Park Development, Part of Lot 5, Concession 1, Division B, City of Guelph" dated August 22, 2018

The Phase One ESA (actually a Phase I ESA) was completed in general accordance with CSA Standard (Z768-01) to support the development and municipal approval process and not in support of a RSC filing.

The Site is currently zoned Urban Reserve (UR) and Agricultural (A), and the proposed zone change is to High Density Apartment (R.4B).

Response: *Acknowledged.*

PARKS AND RECREATION DEPARTMENT (dated November 23, 2018)

PARK PLANNING COMMENTS

Official Plan Amendment and Zoning Bylaw Amendment:

Comment 1: Park Planning has no objection to the proposed Official Plan Amendment to change the existing "Low Density Greenfield" and "Natural Heritage" designations to High Density Residential designation with site specific provisions to limit height to four storeys on the middle portion of the site and "open Space and Park" Designation on the southerly part of the site.

Park Planning has no objection to the proposed Zoning By-law amendment to rezone the site from "Urban Reserve" (UR) and "Agricultural" (A) to a "Specialized High Density Residential Apartment" (R.4B-?) and "neighbourhood Park" (P.2) Zone.

Response: *Acknowledged.*

DEVELOPMENT CONCEPT PLAN

Parkland Dedication:

Comment 1: Park planning comments for parkland dedication are being provided with the assumption that the development will be subject to the City's new parkland dedication bylaw, which is currently being updated and anticipated to be in effect prior to the OPA and ZBA for this application being finalized. The bylaw in effect at the time of building permit will determine the parkland dedication amount.

The proposed development plan proposes a development area of 7.01 hectares and a Parkland Dedication of 1.2 hectares.

The draft parkland dedication bylaw requires that lands outside of Downtown to be developed for residential purposes with a total proposed density equal to or greater than 100 dwelling units/hectare convey for parkland dedication the greater of:

- i. A portion of the land not exceeding 1ha per 500 dwelling units, not to exceed 20% of the total area of land; or
- ii. 5% of the total area of the land.

The concept plan includes 800 dwelling units. Using the rate of 1ha/500 units, the parkland dedication amount would be 1.6ha. A maximum of 20% of the land area is triggered in this case with the total parkland dedication requirement being 1.4ha.

The 1.2ha area of parkland dedication provided on the proposed development plan is unsatisfactory to Park Planning.

Response: *The proposed park has been updated on the revised development concept plan.*

Park Block Lot Frontage:

Comment 1: The current concept plan has identified approximately 41 metres of lot frontage for a 1.2ha park block. Park Planning requires 1 metre of Park Lot Frontage for every 100 square metres of park area (and a minimum of 50 metres) as identified in Section 9.2 of the Zoning Bylaw.

The required Park Lot Frontage is calculated as follows:

Park Area: 1.4 hectares @ 1m/100m² = 140 metres of street frontage.

The amount of Lot Frontage proposed is unsatisfactory to Park Planning.

Response: *The proposed park has been updated on the revised development concept plan.*

Park Block Location:

Comment 1: The concept plan identifies a significant portion of the parkland located behind residential homes on Whitelaw Road. This is not ideal for parkland as it does not have active surveillance of the area. In previous comments, the City encouraged a pedestrian connection to Shoemaker Crescent to promote activity through this section of the proposed park. Based on the revised concept plan it appears that this is not possible on lands located within the City of Guelph.

The City would be interested in discussing with the applicant the possibility of obtaining an easement in favour of the City of Guelph over a portion of land owned by the applicant in the Township of Guelph-Eramosa for the purpose of a trail connection to Shoemaker Crescent at the zoning stage.

Response: *The proposed park has been updated on the revised development concept plan.*

Buffer Strip

Comment 1: A buffer strip is required adjacent to the park. The content of the buffer strip will be determined during the Site Plan process.

Response: *Acknowledged.*

FUNCTIONAL SERVICING BRIEF

Infiltration Area:

Comment 1: It is unclear why an infiltration area is needed in the proposed park. The parkland will be impervious and therefore should not require a SWM facility. Further discussion is needed. Figure 1 in the Functional Servicing Brief also appears to show private land draining to the park infiltration area (catchment number 104). Note that SWM facilities are not considered parkland and would not count toward parkland dedication requirements.

Response: *As outlined in the revised Functional Servicing Brief (GM BluePlan Engineering Limited, dated May 2019), the stormwater management approach and infiltration gallery design for the site has been revised.*

Preliminary Servicing Plan:

Comment 1: As per the City's Development Charges Bylaw Local Service Policy the City requires parkland to be conveyed free and clear of encumbrances. As such, the proposed water service through the proposed park is not supported by Park Planning.

Response: *As outlined in the revised Functional Servicing Brief (GM BluePlan Engineering Limited, dated May 2019), the conceptual watermain alignment for the servicing of the development site has been revised.*

Preliminary Park Block Grading:

Comment 1: The preliminary grading plan provided is not sufficiently detailed to assess whether the park block can be designed to meet City standards. Please demonstrate in the preliminary grading plan that the proposed park site contains sufficient table land (approximately 80% of the site) as per Official Plan policy 7.3.2.4.v. Also note that as per Official Plan policy 7.3.5.5.ii, the City will not accept parkland that has steep slopes that would interfere with development or use as an active public recreation area. Note that Map 2 in the EIS shows a steep slope through a significant portion of the park area. This will not be accepted by park planning.

Response: *As illustrated on the Preliminary Site Servicing and Grading Plan (GM BluePlan Engineering Limited Drawing No. SSGP-1), the grading of the park block has been revised.*

PLANNING JUSTIFICATION REPORT

Comment 1: Section 5.5 The EIS identifies a cultural meadow community located in the southeastern corner of the subject property within the proposed park. This area appears to be a potential environmental condition that interferes with potential development as an active public recreation area. Please clarify how the cultural meadow complies with Parkland Dedication policy 7.3.5.ii.

Response: *To be addressed under separate cover by others (GSP Group).*

Comment 2: Section 6.4.10. The Planning Justification Report does not sufficiently address Official Plan Park and Parkland Dedication policies. In particular, the City is interested in further clarification on how the proposed parkland adheres the following policies:

Section 7.3.5 ii. *That the site is not susceptible to major flooding, poor drainage, **steep slopes** or other **environmental or physical conditions** that would interfere with its potential development or use as an active public recreation area;*

Section 7.3.2.4.iii. *that the site contains adequate street frontage for visibility and safety;*

Section 7.3.2.4.v. *that the site contains sufficient table land (approximately 80 percent of site) and is well drained, except where the site takes advantage of a specific natural feature;*

Response: *To be addressed under separate cover by others (GSP Group).*

Comment 3: As per previous Park Planning comments provided at the pre-consultation meeting, the City is also interested in further clarification on the following:

1. How will activity and surveillance be promoted in a future park block; and
2. How will residents of the site and larger neighbourhood access the park and are connections available.

Response: *To be addressed under separate cover by others (GSP Group).*

ENVIRONMENTAL IMPACT STUDY

Open Space Works and Restoration:

Comment 1: There is a small cultural meadow community located in the southeastern corner of the subject property. The cultural meadow contains invasive species and potential hazard (ash) trees. The City will not accept parkland that contains ash trees. The owner will be responsible for the removal of ash trees within the proposed park and any associated restoration. Please update the Tree Inventory and Preservation Plan to indicate removal of Ash trees within the proposed park.

Response: *Please see the enclosed Paisley Park Tree Inventory & Preservation Plan prepared by Natural Resource Solutions Inc. (dated May 2019).*

Demarcation:

Comment 1: As per the City's demarcation policy, City-owned open spaces are required to be demarcated. Please provide the basic approach to demarcation of City lands. The final configuration of the fencing will be determined during the detailed design stage.

Section 6.1.1 Mitigations, bullet 5 makes an assumption that compensation plantings can be provided within open spaces of the proposed development. Please add a note clarifying that compensation plantings will not be accepted within the proposed park parcel.

Response: *Please see the enclosed Paisley Park Environmental Impact Study – Addendum Letter Impact Assessment on Hydrologic Function of the Wetland prepared by Natural Resource Solutions Inc. (dated May 2019).*

Conditions of Development:

Prior to Site Plan approval:

Comment 1: The Developer shall **dedicate Block xxx for park purposes** in accordance with the provisions of City of Guelph By-law (1989)-13410, as amended by By-law (1990)- 13545, By-Law (2007- 18225), or any successor thereof.

Response: *Acknowledged.*

Comment 2: The Developer shall be responsible for the cost of design and development of the **Basic Park Development** as per the City of Guelph current "Specifications for Parkland Development", which includes clearing, grubbing, topsoiling, grading, sodding and any required servicing including water, storm, sanitary and hydro for any phase containing a Park block to the satisfaction of the Deputy CAO of Public Services. The Developer shall provide the City with **cash or letter of credit** to cover the City approved estimate for the cost of development of the Basic Park Development for the Park Block to the satisfaction of the Deputy CAO of Public Services.

Response: *Acknowledged.*

Comment 3: The Developer shall be responsible for the cost of design and development of the **demarcation** of all lands conveyed to the City in accordance with the City of Guelph Property Demarcation Policy. This shall include the submission of drawings and the administration of the construction contract up to the end of the warrantee period completed by an Ontario Association of Landscape Architect (OALA) member for approval to the satisfaction of the Deputy CAO of Public Services. The Developer shall provide the City with **cash or letter of credit** to cover the City approved estimate for the cost of development of the demarcation for the City lands to the satisfaction of the Deputy CAO of Public Services.

Response: *Acknowledged.*

Comment 4: The Developer shall be responsible for the cost of design and implementation of the **Open Space Works and Restoration** in accordance with the "Environmental Implementation Report" to the satisfaction of the Deputy CAO of Public Services. This shall include the submission of drawings and the administration of the construction contract up to the end of the warrantee period completed by an Ontario Association of Landscape Architects (OALA) member for approval to the satisfaction of the Deputy CAO of Public Services. The Developer shall provide the City with **cash or letter of credit** to cover the City approved estimate for the cost of the Open Space works and restoration for the City lands to the satisfaction of the Deputy CAO of Public Services.

Response: *Acknowledged.*

Comment 5: The Developer shall provide Community Design and Development Services with a digital file in either AutoCAD - DWG format or DXF format containing the following final approved information: parcel fabric, development layout and park design, grades/contours and landscaping.

Response: *Acknowledged.*

GRCA COMMENTS (dated November 5, 2018)

Resource Issues:

Comment 1: The subject lands are adjacent to a wetland, and other natural heritage features.

Response: *Acknowledged.*

Legislative/Policy Requirements and Implications:

Comment 1: We have reviewed the circulated documents prepared in support of the proposed development application. Due to the adjacent wetland area, we have reviewed the Environmental Impact Study (EIS). The EIS is adequate and its recommendations and mitigation measures should be fully implemented at detailed design stage.

We are satisfied our comments can be addressed through detailed design, site plan and the GRCA permit process.

Response: *Acknowledged.*

Additional information/suggestions provided in an advisory capacity:

Comments to be addressed at detailed/site plan

Comment 1: EIS Section 6.1.1 Tree and Vegetation Removal, the proposed relocation of the Hairy Aster which is a rare plant for Wellington County should include a maintenance and monitoring plan to determine the effectiveness of the relocation.

Response: *Acknowledged. To be addressed at the detailed design stage.*

Comment 2: EIS Section 6.1.3 Encroachment into Buffers, at detailed design stage they will need to specify the extent of grading required within the 30m buffer but still outside of the 15m no-touch setback. Enhanced buffer treatments such as vegetation planting may be required to maintain the expected function.

Response: *Acknowledged. To be addressed at the detailed design stage.*

Comment 3: A detailed grading plan will be required at detailed design stage. The Functional Servicing Report and the Geotechnical Report identify that significant cut and fill grading operations will be required. A Geotechnical Engineer should be retained to ensure that runoff and infiltration rates are achieved at the detailed design stage.

Response: *Acknowledged.*

Comment 4: The EIS is adequate and its recommendations and mitigation measures should be fully implemented at detailed design stage.

Response: *Acknowledged.*

Comment 5: The pre-development area is modelled as 7.01 ha while the post development catchments are 6.895 ha. Please clarify.

Response: *Please see the revised Functional Servicing Brief prepared by GM BluePlan Engineering Limited (dated May 2019).*

Comment 6: Demonstrate 1m separation between bottom of all infiltration galleries and seasonally high groundwater elevations.

Response: *Acknowledged.*

POLICY PLANNING AND URBAN DESIGN (dated January 7, 2019)**ENVIRONMENTAL PLANNING COMMENTS**

Comment 1: Based on the Functional Servicing Brief, it appears that a site level water balance has been completed, which demonstrates an infiltration balance based on pre- to post-development conditions. Under the proposed development scenario, flow rates leaving the site match pre- development conditions. However, the report also demonstrates that there is a 161% increase in total annual runoff (m3/year) from the site. It appears that the vast majority of site runoff will be directed toward the adjacent wetland via the stormwater management facility. Reduced evapotranspiration due to an increase in impervious cover results in increased run off. The water balance demonstrates a 45% difference between pre- to post- development runoff volumes. This is a concern given that the adjacent wetland is an internally draining surface water fed feature with no outlet.

Response: *Please see the revised water balance analysis included in the revised Functional Servicing Brief prepared by GM BluePlan Engineering Limited (dated May 2019).*

Comment 2: As previously requested in environmental planning comments provided on the EIS TOR, dated February 8, 2018, the application will need to demonstrate (via a feature based monthly water balance) how the development will not negatively impact the hydrologic function of the wetland. To assist with the preparation of a feature based monthly water balance, and interpretation of potential negative impacts to the hydrologic function of the wetland, environmental planning staff offer the following comments:

- The predevelopment site should be modelled based on existing catchments. Based on topography, there appears to be at least two catchments, one draining to the wetland and one draining towards Whitelaw Road. A feature based water balance should be prepared based on the wetland's catchment and should include an assessment of the proportion of the catchment comprised by the subject site.
- Average annual precipitation is estimated to be about 923.3mm for the subject site. The feature-based monthly water balance should identify the volume of runoff directed to the wetland.
- The goal of matching flow rates in stormwater management design is based on a watercourse as the receiver, and is not applicable to situations where a wetland is the receiver. For wetlands, matching volume and timing of flows is important.
- A hydrograph showing pre- and post-development conditions should be provided.
- Discharge rates and flow volumes anticipated to flow from proposed stormwater management facilities under different designed storm events should be provided.

Response: *Please see both the enclosed Paisley Park Environmental Impact Study – Addendum Letter Impact Assessment on Hydrologic Function of the Wetland prepared by Natural Resource Solutions Inc. (dated May 2019) and the revised water balance analysis included in the revised Functional Servicing Brief prepared by GM BluePlan Engineering Limited (dated May 2019).*

Comment 3: The results of the feature based monthly water balance should be used to assess potential impacts to wetland hydrology, and changes to vegetation communities (e.g. based on sensitivity of existing vegetation). If negative impacts are confirmed through this analysis, an updated development concept, stormwater management design and supporting Environmental Impact Study that demonstrates the hydrology of the adjacent wetland can be protected will be required to gain environmental planning support of this development application.

Response: *Please see both the enclosed Paisley Park Environmental Impact Study – Addendum Letter Impact Assessment on Hydrologic Function of the Wetland prepared by Natural Resource Solutions Inc. (dated May 2019) and the revised water balance analysis included in the revised Functional Servicing Brief prepared by GM BluePlan Engineering Limited (dated May 2019).*

COUNTY OF WELLINGTON**PLANNING AND DEVELOPMENT DEPARTMENT COMMENTS**Subject Property

Comment 1: The subject property is approximately 60 ha (148 ac) in size and is partially located within the Township of Guelph/Eramosa and the City of Guelph. The property is designated Prime Agricultural, Core Greenland's and Greenland's in the County Official Plan and designated Low Density Greenfield Residential and Natural Heritage in the City Official Plan.

Response: *Acknowledged.*

Urban Fringe

Comment 2: We understand that the proposed development will consist of 5 different apartment buildings, ranging from 8-10 stories and 162 stack townhome and townhome units up to 4 stories in height. The planning justification report indicates an overall density of 137 units/ha will be achieved on the site. Due to the location of the subject property, the proposal would place this high density development immediately adjacent to the City limits and agricultural lands in the County of Wellington.

While we are mindful of the City's desire for intensification at the Elmira Road and Paisley Road Node, this office would ask that consideration be given to providing appropriate transition to adjacent agricultural areas and the rural landscape.

Response: *To be addressed under separate cover by others (GSP Group).*

Traffic Impacts

Comment 1: The information received by the Planning Department regarding this development proposal was forwarded on to the Wellington County Engineering Services Department for review and comment. Attached to this letter are comments from Engineering Services.

Response: *Acknowledged.*

Natural Environment

Comment 1: The natural features present on the subject property are within the County of Wellington and include a provincially significant wetland and a significant wooded area. These features and their natural functions are required to be protected from the negative impacts of the proposed development.

We are in receipt of the Grand River Conservation Authorities (GRCA) comments regarding the proposed development and the environmental Impact study submitted by the applicants. The County is supportive of GRCA's comments and requests that the recommendations and mitigation measures identified in the EIS be fully implemented at the appropriate time.

Response: *Acknowledged.*

GUELPH HYDRO ELECTRIC SYSTEMS INC. COMMENTS (dated November 15, 2018)

Comment 1: Hydro supply for this development will be supplied from both Paisley Road and Whitelaw Road.

Response: *Acknowledged.*

- Comment 2:** The hydro services for this development will be underground except for pad-mounted transformers.
- Response:** *Acknowledged.*
- Comment 3:** A minimum distance of 3.0 metres must be maintained between any dwelling units and pad-mounted transformers.
- Response:** *Acknowledged.*
- Comment 4:** A minimum distance of 1.5 metres must be maintained between any driveways/entrances and street light poles or pad-mounted transformers. Any relocations required would be done at the owner's expense.
- Response:** *Acknowledged.*
- Comment 5:** A 4.5 metre by 4.5 metre level area will be required for each low-profile, pad-mounted transformer on the property. Each pad-mounted transformer will supply approximately eight units. The location of the transformers are to be determined through consultation with the Guelph Hydro Engineering Department.
- Response:** *Acknowledged.*
- Comment 6:** Hydro meter locations are subject to Guelph Hydro standards and requirements.
- Response:** *Acknowledged.*

MISSISSAUGAS OF THE NEW CREDIT FIRST NATIONS COMMENTS (dated May 28, 2019)

- Comment 1:** At this time, MNCFN does not have a high level of concern regarding the proposed project and therefore, by way of this letter, approves the continuation of this project. However, MNCFN requests that you continue to notify us about the status of the project. In addition, we respectfully ask you to immediately notify us if there are any changes to the project as they may impact MNCFN's interests and that you please provide us with a copy of all associated environmental and archaeology reports. This includes, but is not limited to changes related to the scope of work and expected archaeological and environmental impacts.
- Response:** *Acknowledged.*
- Comment 2:** Additionally, MNCFN employs Field Liaison Representatives ("FLRs") to act as official representatives of the community and who are answerable to MNCFN Chief and Council through the Department of Consultation and Accommodation. The FLRs' mandate is to ensure that MNCFN's perspectives and priorities are considered in the field and to enable MNCFN to provide timely, relevant, and meaningful comment on the Project. Therefore, it is MNCFN policy that FLRs are on location whenever any fieldwork for environmental and/or archaeological assessments are undertaken. It is expected that the proponent will cover the costs of this FLR participation in the fieldwork. Please also provide the contact information of the person, or consultant, in charge of organizing this work so they may facilitate the participation of the MNCFN FLRs.
- Response:** *Acknowledged. To be provided under separate cover.*
- Comment 3:** Nothing in this letter shall be construed as to affect the Aboriginal or Treaty rights and hence shall not limit any consultation and accommodation owed to MNCFN by the Crown or any proponent, as recognized by section 35 of the Constitution Act, 1982.
- Response:** *Acknowledged.*

Comment 4: MNCFN reserves the right in relation to any development project or decision, to decide whether it supports a project and to: comment to regulators, participate in regulatory processes and hearings, seek intervenor funding or status, or to challenge and seek remedies through the courts.

Response: *Acknowledged.*

Comment 5: MNCFN expects all proponents to act according to the following best practices:

- Engage early in the planning process, before decisions are made
- Provide information in meaningful and understandable formats.
- Convey willingness to transparently describe the project and consider any MNCFN concerns.
- Recognize the significance of cultural activities and traditional practices of the MNCFN
- Demonstrate a respect for MNCFN knowledge and uses of land and resources.
- Understand the importance of youth and elders in First Nation communities.
- Act with honour, openness, transparency and respect.
- Be prepared to listen and allow time for meaningful discussion.

Response: *Acknowledged.*

TOWNSHIP OF GUELPH/ERAMOSIA COMMENTS (Received from MHBC dated November 29, 2018)

Stormwater Management

Comment 1: We understand that the stormwater management facility is located within the City of Guelph, but outlets to the Township of Guelph/Eramosa. As the existing property currently straddles the municipal boundary, it is expected that the undeveloped portion in the Township of Guelph/Eramosa would ultimately be severed from the developed lands located in the City. At which point the stormwater pond outlet must be secured and protected via easement to the ultimate receiver on the undeveloped lands.

Response: *Acknowledged.*

Comment 2: We are in receipt of the County of Wellington comments regarding the proposed development. The Township is supportive of these comments and requests that the County's comments and recommendations be implemented. Through the site plan approval process, we ask that City staff consider measure to minimize any negative impacts on the adjacent agricultural lands, including trespassing, dumping, etc.

Response: *Acknowledged.*

Comment 3: Township of Guelph/Eramosa requests that it be circulated on any Notice of Public meeting on this matter. Overall the Township of Guelph/Eramosa is generally supportive of the proposed redevelopment.

Response: *Acknowledged.*

UPPER GRAND DISTRICT SCHOOL BOARD COMMENTS (dated November 7, 2018)

Comment 1: Please be advised that the Planning Department does not object to the proposed application, subject to the following conditions:

- That Education Development Charges shall be collected prior to the issuance of a building permit
- That the developer agrees to provide the Upper Grand District School Board with a digital file of the plan of subdivision in either ARC/INFO export or DXF format containing parcel fabric and street network
- That the developer shall agree in the site plan agreement/condominium declaration that adequate sidewalks, lighting and snow removal (on sidewalks and walkways) is provided to allow children to walk safely to school or to a designated bus pickup point
- That the developer and the Upper Grand District School Board reach an agreement regarding the supply and erection of a sign (at the developer's expense and according to the Board's specifications) affixed to the permanent development sign advising prospective residents that students may be directed to schools outside the neighbourhood
- That the developer agrees in the site plan agreement/condominium declaration to advise purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease, until such time as a permanent school is assigned:

Whereas the Upper Grand District School Board has designated this subdivision as a Development Area for the purposes of school accommodation, and despite the best efforts of the Upper Grand District School Board, sufficient accommodation may not be available for all students anticipated from the area, you are hereby notified that students may be accommodated in temporary facilities and/or bussed to a school outside the area, and further, that students may in future have to be transferred to another school."

- That the developer shall agree in the site plan agreement/condominium declaration to advise all purchasers of residential units and/or renters of same, by inserting the following clause in all offers of Purchase and Sale/Lease:

"In order to limit liability, public school buses operated by the Service de transport de Wellington-Dufferin Student Transportation Services (STWDSTS), or its assigns or successors, will not travel on privately owned or maintained right-of-ways to pick up students, and potential busing students will be required to meet the bus at a congregated bus pick-up point."

Response: *Acknowledged.*

Comment 2: We are supportive of the Traffic Impact Study which recommends that sidewalks be included along the frontage of Whitelaw Road to connect to existing sidewalks on both Paisley Road and Whitelaw Road to the south of the subject property. We are also encouraged to see active transportation infrastructure included throughout the property as outlined in the concept design.

Response: *Acknowledged.*

Comment 3: It is unfortunate that the site plan for 0 Paisley Road did not accommodate public pedestrian connections between Elmira Road and Whitelaw Road.

Response: *Acknowledged.*

Comment 4: Given the potential for increased student walkers in this area, there may also be a future need for Adult School Crossing Guards to address students crossing to both 361 Whitelaw Road and 0 Paisley Road.

Response: *Acknowledged.*



We trust this is the information you require at this time. If you have any questions or require additional information, please do not hesitate to call.

Yours truly,

GM BLUEPLAN ENGINEERING LIMITED

Per:

A handwritten signature in blue ink, appearing to read 'AKroetsch'.

Angela Kroetsch, P.Eng.

AK/jb

cc: Chris Corosky, Armel Corporation
Chris Sims, GM BluePlan Engineering Limited
Glenn Scheels, GSP Group Inc.
Julia Salvini, Salvini Consulting
Tara Brenton, Natural Resource Solutions Inc.

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