



October 9, 2019
Our File: 118031

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

Attention: Katie Nasswetter

Re: 360 and 361 Whitelaw Road
City of Guelph
Zoning By-law Amendment/OPA
Response Letter to Recent Comments

In response to the comments received regarding the Proposed Official Plan and Zoning By-law Amendment for 360 and 361 Whitelaw Road in the City of Guelph, our team offers the following responses for your review and consideration:

INFRASTRUCTURE DEVELOPMENT AND ENTERPRISE

Planning and Building Services (For 361 Whitelaw Road, Memo dated July 17, 2019)

Functional Servicing Brief

- Comment 1:** Please note that the City of Guelph does not support infiltration of stormwater runoff generated from driving aisles and parking areas. Please revise the stormwater management plan accordingly.
- Response:** *The stormwater management has been revised to remove infiltration of stormwater runoff generated from driving aisles and parking areas. Runoff generated from the driving aisles and parking areas is now attenuated on site and directed to the existing storm sewer in the Paisley/Whitelaw Road right-of-ways.*
- Comment 2:** Please provide a map of proposed post-development catchments.
- Response:** *A figure of post-development catchments and a figure of pre-development catchments has been provided in the Functional Servicing Brief Addendum.*
- Comment 3:** Table 10 indicates that under post-development conditions, runoff to Paisley/Whitelaw right-of-ways will be reduced to 0, however the Preliminary Site Servicing and Grading Plan indicate that drainage is directed to the right-of-ways. Please clarify.
- Response:** *The Functional Servicing Brief has a table identifying the runoff generated from the site and directed to the Paisley/Whitelaw right-of-ways.*
- Comment 4:** The Monthly Water Balance Summary indicates a 63% increase in recharge to the wetland (22,402 m³/yr). How will increased recharge impact groundwater levels and hydrology of the receiving wetland?.
- Response:** *The addendum to the Functional Servicing Brief has a revised stormwater management design that balances recharge and runoff volumes to the wetland.*

Comment 5: The proposed development (inclusive of the bioretention cell) will result in a 0.2% increase in runoff to the wetland under post-development conditions, resulting in an increase of 150 m³ of runoff to the wetland annually. The FSR states that runoff will increase by 0.96 m³ per event, representing an increase in the overall wetland surface water depth of 0.04 mm per event. The monthly variation summary provided in Table 14 indicates a 15,165 m³ increase in runoff (exclusive of the bioretention cell), representing a 132% or 3.6 mm increase in wetland surface water depth per event. These findings should be related to the hydrogeological assessment. At what depth is the water table located? Will stacking occur? If back-to-back storms occur, what is the ponding depth and duration of flooding (i.e. inundation period)? Based on the monthly breakdown provided in Tables 12 and 13, the greatest increase in runoff occurs in the spring months, presumably when groundwater levels are at their highest. Please clarify and incorporate pre-to-post hydrographs that incorporate results of groundwater monitoring, to demonstrate how the hydroperiod of the wetland may be impacted.

Response: *The revised stormwater management design does not include a bioretention cell and instead a portion of the site is directed to the Paisley Road/Whitelaw Road right-of-ways. The proposed stormwater management design results in an additional 99 m³ of runoff to the wetland annually and a 7 m³ decrease of recharge on the site annually.*

The greatest change in runoff to the existing wetland occurs in May with an increase in wetland depth of approximately 6mm. This assumes that all runoff in May occurs in 1 event. If the total runoff volume of 6mm occurs over multiple events (i.e. 1 event every 2 to 3 days or 12 events per month), the increase in wetland depth per event in the month of May is approximately 0.5mm. Based on the theoretical change in wetland depth of 6mm (or 0.5 mm per event) for the month of May, this theoretical stacking is not significant and will not impact the function of the wetland.

Seasonal high groundwater levels have been taken from the Hydrogeological Study for Paisley Park Development (GM BluePlan Engineering Limited, dated October 2019) and incorporated into the infiltration gallery designs, as shown on the engineering drawings.

Comment 6: Table 13 Catchment 200 indicates vegetation is shallow rooted. Catchment 200 consists of a treed swamp. Please clarify.

Response: *The vegetation in Catchment 200 has been revised to trees in the Functional Servicing Brief addendum.*

Comment 7: Please provide supporting details for the proposed LID measures to demonstrate that they will function as anticipated. For example, please demonstrate that 1.0m separation from groundwater can be accommodated. Has a mounding analysis been completed?

Response: *Seasonal high groundwater levels have been taken from the Hydrogeological Study for Paisley Park Development (GM BluePlan Engineering Limited, dated October 2019) and incorporated into the infiltration gallery designs, as shown in the engineering drawings. Additional groundwater mounding analysis was completed per CVC guidelines and was found to be negligible for the proposed infiltration galleries and has been included in the Functional Servicing Report Addendum (GM BluePlan Engineering Limited, dated October 2019).*

Impact Assessment on Hydrologic Function of Wetland

Comment 8: The impact assessment states that “under both proposed SWM scenarios (i.e. with or without enhanced LIDs with a bioretention cell) the fluctuation in the level of the wetland is not dramatically altered”. The FSR demonstrates a difference of 15,015m³/yr of runoff (150 m³/yr compared to 15,165 m³/yr). It is the opinion of City staff that the magnitude of change proposed would be more appropriately characterized as ‘significant’, not ‘slight’. Please clarify how a 10,010% increase (15,015m³/yr) would not be considered a dramatic alteration.

Response: *The addendum to the Functional Servicing Brief has a revised stormwater management design that balances recharge and runoff levels to the wetland.*

Comment 9: Where did the post-development monthly recharge rates come from in Table 1? Values provided do not appear to reflect the Revised FSR.

Response: *Table 1 in the Paisley Park Environmental Impact Study – Addendum Letter 2 (October 2, 2019) (also included as Table 17 in the Functional Servicing Report Addendum) is a summary of the water balance for the wetland and includes recharge and runoff rates from Catchments 10, 20, and 30, whereas the Functional Servicing Report Addendum Table 16 focuses on the site changes and summarizes changes in recharge and runoff rates from Catchments 10 and 20. The water balance values for Catchment 30 can be found in the monthly water balance tables.*

Comment 10: Under impact assessment on hydrologic function of the wetland, please note that the planning test is “no negative impact”, not “significantly alter”.

Response: *Acknowledged. The addendum to the Functional Servicing Brief has a revised stormwater management design that balances recharge and runoff levels to the wetland.*

Comment 11: Regarding the vegetation sensitivity analysis presented, City staff disagree with the conclusions drawn from this analysis. Firstly, the TRCA Wetland Water Balance Risk Assessment involves three steps: Step 1: Determine which retained wetland(s) may be impacted; Step 2: Determine the magnitude of potential hydrological change; and Step 3: Determine the sensitivity of the wetland. Based on criteria provided in Tables 2 and 3 of TRCA’s Risk Assessment and information presented in the EIS and EIS Addendum, the magnitude of potential hydrological change appears to be “medium magnitude”, and the sensitivity of the wetland to hydrological change appears to be “high sensitivity”. Figure 3: Wetland Risk Evaluation Decision Tree indicates that where the magnitude of hydrological change is “medium” and sensitivity of the wetland is “high”, the risk assignment is “high risk”. City staff are supportive of the use of TRCA’s Risk Assessment tool; however, it should be applied holistically and not based solely on a singular Step or criterion.

Response: *NRSI has completed the TRCA Wetland Water Balance Risk Assessment (2017) for the proposed development (see Paisley Park Environmental Impact Study – Addendum Letter, October 2, 2019). The proposed development was determined to have a ‘Low’ overall magnitude of hydrological change, and a ‘High’ overall wetland sensitivity. Therefore, according to the Wetland Risk Evaluation Decision Tree (TRCA 2017), the overall risk to the wetland from the proposed Paisley Park development is considered ‘Low’.*

Comment 12: In TRCA's Risk Assessment, Freeman's Maple Mineral Deciduous Swamp Vegetation Type (SWD3-3) has 'medium' sensitivity to changes in hydrology and are tolerant of 'slight hydrological changes'. Altering the hydrological inputs to a wetland to the extent that the wetland's form and function is impacted (e.g., a swamp turning into a marsh) is considered a negative impact. City of Guelph Official Plan policy does not permit development or site alteration that may negatively impact a Significant Wetland. The EIS should include a characterization of the wetland's hydrology, including surface and groundwater inputs, and an assessment of potential impacts to wetland hydrology resulting from increased runoff and increased infiltration from the developable portion of the property, in concert with the groundwater condition (e.g., impacts to groundwater resulting from increased infiltration, runoff stacking and inundation periods).

Response: *Additional detail has been provided in NRSI's Paisley Park Environmental Impact Study – Addendum Letter (October 2, 2019). The post-development differences in recharge and runoff volumes are estimated to be negligible. Compared to existing volumes, the total post-development annual recharge volume is estimated to be only -0.08% different, while the total post-development runoff volume is estimated to be only 0.86% different.*

Comment 13: The wildlife sensitivity analysis should incorporate an assessment of potential impacts to anurans, especially those considered to be highly sensitive to hydrological changes. For example, what is the proposed inundation period and ponding depth in the receiving wetland? What are the known hydrological thresholds for these species (e.g. maximum depth, hydroperiod)?

Response: *Additional detail has been provided in NRSI's Paisley Park Environmental Impact Study – Addendum Letter (October 2, 2019). No specific water depth thresholds for breeding anurans, their egg deposition or larvae are reported in the literature, however, given the post-development differences in recharge and runoff volumes are estimated to be negligible, there are no anticipated negative impacts to breeding anurans within the wetland.*

Comment 14: An evaluation of potential negative impact to the natural heritage system resulting from stormwater management and dewatering required to accommodate underground parking should be incorporated into a revised EIS.

Response: *There will be no permanent dewatering systems associated with the final development. If necessary, the underground parking areas will be waterproofed as per the Ontario Building Code (Government of Ontario 1992). This will be determined at the detailed design stage of the development.*

Paisley Park Tree Inventory and Preservation Plan

Comment 15: Environmental planning staff encourage exploring opportunities to preserve existing trees that are native and in good condition.

Response: *Consistent with the City of Guelph's Tree Protection Policies and Guidelines (City of Guelph 2010), a comprehensive tree inventory was undertaken documenting all trees that are $\geq 10\text{cm}$ Diameter at Breast Height (DBH) within and adjacent to the proposed development area. A summary of inventory findings, high level tree retention and removal analysis, mitigation and protection measures, as well as compensation requirements are included in the Tree Inventory and Preservation Plan, appended to the Environmental Impact Study (NRSI 2018). As part of the detailed site design during the site plan approval process and once the site layout has been confirmed, opportunities for tree preservation will be further examined.*

Supplementary Information Addendum for Hydrogeological Study

Comment 16: Monitoring results for PZ-05, PZ-06 and PZ-04 appear to be missing.

Response: *Monitoring data from these piezometers has been included in the revised Hydrogeological Study.*

Comment 17: Underground parking is proposed. What are the dewatering requirements? Can the minimum 1.0m separation distance to groundwater be achieved or will waterproofing need to be considered?

Response: *If necessary, the underground parking will be waterproofed in accordance with OBC requirements to remove the need for a subdrain system. Temporary dewatering may be required during the construction phase.*

Hydrogeological Study, GM BluePlan Engineering, August 2018 Comments provided on behalf of City Hydrogeologist, Scott Cousins

Comment 18: Please include commentary on how and why horizontal groundwater flow was inferred when a number of monitoring wells were drilled onsite and could have been used to calculate gradients.

Response: *Section 3.5 describes the direction of groundwater flow per the piezometric contours on Figure 7. Arrows explicitly showing the horizontal pattern of interpreted groundwater flow have been added to Figure 7. Approximate horizontal gradients have been included in the revised version of the report.*

Comment 19: Why is the author speculating on vertical hydraulic gradients in section 2.4? Please reference calculations made based on water levels observed at onsite monitoring wells.

Response: *Section 2.4 is a preliminary inference based on desktop data only. Calculated vertical gradients and flow directions are referred to in Section 4. We trust that the description in Section 4 is sufficient with respect to the monitoring wells in question.*

Comment 20: Were all monitoring wells developed regardless of whether they were sampled or not? This may contribute to water levels that are not representative of actual conditions, especially in dense, fine-textured soils. Please clarify.

Response: *Only wells that have been subject to sampling have been developed. Development of piezometers (i.e. a device used to measure piezometric head) is very important for monitoring water levels under dynamic conditions, such as for slug tests or pumping tests, but is typically of much lesser importance for long term monitoring of static or quasi-static conditions. Poor connectivity between the well and the formation may result in a degree of lag between the formation conditions and the monitoring well response, but lag is inescapable in Casagrande-type piezometers. It is our opinion that the piezometers are suitably connected to the formation for the purposes in which they are used.*

Comment 21: Please provide some type of reference or rationale as to why Cobalt is considered to be naturally occurring on site.

Response: *Heavy metals have occasionally been observed in elevated concentrations in other sites in the Guelph area wherein no apparent environmental impacts, potentially contaminating activities, or sources were identified. As such, it is understood to be naturally occurring.*

Comment 22: Visual observation cannot replace hydraulic gradient data in the context of seepage. Simply because it cannot be visually observed does not mean it is not occurring. Why were nested piezometer locations not established in or near the wetland to determine vertical gradients?

Response: *As indicated in Section 2.7, the area has been identified as a "swamp-type" wetland. Hydrologically, swamps are dominated by surface water flow with flooding being more related to spring melt, runoff, and topography. Water levels monitored in the four piezometers decline over the course of the year from winter to autumn and are thus indicative of the dominance of seasonal surface input compared to*

groundwater discharge. Though the site may exhibit the topographic configuration similar to an upgradient local basin and thus appear to be a “discharge” zone (i.e. by Tothian flow patterns), functionally it behaves as a recharge area owing to the much more significant input from precipitation and runoff, which periodically and seasonally inundates the area. The influence of groundwater discharge is also further minimized due to the prevalence of low-k till soils. Due to the minor role played by groundwater discharge at this location, it was deemed more important to describe the actual range of groundwater levels to aid in stormwater management design (i.e. infiltration gallery placement) rather than quantitatively determine the vertical gradient.

Surface water levels of the pond in the swamp area have been compared to the water levels in piezometers PZ-05 and PZ-06 to give a rough idea of vertical gradient between shallow groundwater and surface water: the results of this comparison have been provided in a revised version of the Report.

Comment 23: The author refers to low hydraulic conductivity soils however there was no hydraulic testing completed onsite to substantiate this claim. The presence of fine-textured soils is not enough evidence to confidently determine that conductivity on site is low. Please reference the grain size analysis curves and known ranges of conductivity.

Response: *The till soil deposits in the Guelph area are well understood to constitute an aquitard and their low hydraulic conductivity compared to other local materials (e.g. glaciofluvial sand and gravels) has been consistently demonstrated by numerous studies. The on-site geotechnical investigation confirms the identification of till soils as well as their density and texture (grain-size distributions showing approximately 50% fines content were provided in Appendix C of the Hydrogeological Report). Experience at other sites and comparison of soil properties to published references indicate that these sand-silt tills usually have hydraulic conductivity on the order of 10⁻⁹ to 10⁻⁷ m/s. Permeameter testing in the till soils on-site was completed by the geotechnical consultant (Chung & Vander Doelen) in the summer of 2018 and the range in hydraulic conductivity was found to range on the orders of 10⁻⁹ and 10⁻⁷ m/s.*

The Hydrogeological Study has been revised to quantitatively describe the till hydraulic conductivity and refer explicitly to the permeameter testing and grain-size analyses results.

Comment 24: What is “bound water”? Is this in reference to a perched groundwater table condition or the water held in capillary suspension around soil grains? Please clarify.

Response: *Yes, “bound water” or “residual moisture” refers to water that remains in the pore throats of the soil matrix due to surface tension. “Bound water” is not apt to flow by gravity, but in fine-textured soils can take up a substantial proportion of the porosity in the soil. Thus, during precipitation events, the soils re-saturate quickly, readily restoring gravity flow and thus resulting in a rapid, apparently disproportionate increase in measured groundwater levels.*

Comment 25: Please include hydrographs in the report, showing a minimum of four seasons of water level fluctuation, as stated in the City’s EIS Guidelines.

Response: *The additional monitoring data has been included in the revised Hydrogeological Report.*

Comment 26: Although the author may disagree with the design requirements of basements and groundwater table separation, the proposed “significant earthworks” do not negate the required condition. Please demonstrate that through the addition of fill material, or site grading, that the separation of basement inverts and high groundwater table can be achieved. This will require the monitoring of groundwater levels throughout four seasons to identify what the high level is. Please note that a foundation drain is not an acceptable alternative to meeting the required 0.5m separation as this condition would cause permanent active dewatering.

Response: *Four seasons of groundwater level monitoring have been completed and updated hydrographs can now be provided. The Seasonal High Groundwater Level surface has been revised from the full data record now available.*

Comment 27: Please provide calculations and explain how dewatering volumes were derived.

Response: *Dewatering calculations for site servicing works were completed using an analytical model for a finite-trench based on Dupuit's theory of groundwater flow. Example calculations have been provided in the revised Hydrogeological Study.*

Comment 28: Figure 7: Please include a north arrow as well as groundwater flow directional arrows.

Response: *The north arrow and groundwater flow directional arrows have been included in the revised Hydrogeological Study.*

Comment 29: Figure 8a: Is the interpreted groundwater table at ground surface? Is the sand and silt lens inferred? If yes, please indicate with a dashed line.

Response: *According to the piezometric readings in certain monitoring wells (e.g. MW-08, and MW-05), the groundwater level does come very near to ground surface. This phenomenon has been observed at other upland/hilltop, till-dominated sites in Guelph and it is understood to be a result of the low hydraulic conductivity soils and the lack of impervious surfaces: infiltration occurs, but internal drainage of the soil mass is very slow, so groundwater levels rise to the surface due to an excess of precipitation over the infiltrative capacity of the soil. Figure 8A has been updated with dashed lines to denote the inferred extents of the sand and silt lens.*

Planning Services – Urban Design Comments (for 361 Whitelaw Road, Memo dated August 7, 2019)

Urban Design Brief Addendum Comments

Part 1 – Apartments (pg. 10) and Building Architecture (pg.14)

Comment 1: Add further discussion around building shaping given policies 8.8 and 8.9 of the Official Plan that talk about:

- Ensuring building entrances are located at regular intervals. Townhouses integrated in to the tower buildings should be explored and would help achieve this direction;
 - Restricting building length;
 - Ensuring adequate spacing between buildings;
 - Ensuring building floorplates are limited; and,
 - Limiting the amount of surface parking

Urban design staff supports the general building lengths shown but will be looking for appropriate building shaping regulations in the Zoning By-law based on the above points. See further discussion below.

Response: *These comments have been addressed in this resubmission Concept Plan. Details of building elevations and entrances to the building as well as individual units will be explored further at the Site Plan Approval stage of the project.*

Comment 2: Staff has concerns with the Towers 3 and 4. Specifically, appropriate justification for deviation from the 45 degree angular plane from the Whitelaw centerline has not been provided. Staff has concerns with the proposed angular plane for the following reasons:

- As shown on the site massing model cross-sections (pg.8), we are concerned with the relationship to the 4 storey buildings on the east side of Whitelaw;
- The massing appears to create shadows on the buildings on the other side of the street and any future sidewalk on the east side of Whitelaw (e.g. afternoon in March/Sept 21).

Given the depth of the site and lack of any required step-backs, staff cannot support the angular plane proposed. Please look at options that push the middle and top of the building further to the west, introduce further step-backs in the Zoning By-law and/or potentially shift these towers westward.

Response: *As previously discussed, the buildings have been set back from Whitelaw Road and Paisley Road so as to achieve a 45 degree angular plane from the centre line of the road, and that is illustrated on the enclosed plans and section drawings.*

Site Circulation (pg.12)

Comment 1: Provide a conceptual cross-section of the internal street through the northern portion of the site. The street furniture elements (e.g. street lighting, trees, catch-basins on the street edge, proper curb and gutter etc.). The internal road needs to feel like an urban street and not simply a drive aisle.

Response: *A conceptual cross-section has been included with this submission. It is our intent that the internal streets will feel like urban streets, and this level of detail will be explored at the Site Plan stage.*

Open Space and Landscape Design (pg.13)

Comment 1: Please add the following to this section:

- Recognize the need to implement a minor gateway feature through landscaping near the city boundary and Paisley Road in accordance with policies 8.4.3 and 8.4.6 of the Official Plan.
- A point that addresses the large outdoor common amenity and notes that the area provides an opportunity to be geared more towards the everyday activities of the residents of the community. Please suggest further direction for programming and should include items like:
 - Raised Community Garden Plots that are barrier-free
 - An off-leash dog area (consider fencing to define this space).
 - Playground for kids (for example a 'naturalized' play space with rubber mounds and climbing logs). Doesn't need to be a traditional space.
 - Treed sitting area with informal, moveable chairs (reading a book or socializing).
 - Small sodded area for throwing/kicking a ball

Response: *A gateway feature will be provided on Paisley Road and this feature along with the comments on the amenity area design will be addressed at the Site Plan stage.*

Building Architecture (pg.14)

Comment 1: Please add the following to this section:

- A point that addresses creating a family of buildings which are not the same. For example create consistent datum/cornice and/or podium height
- Revise item d) to provide additional direction. For example, along Whitelaw and Paisley, buildings are to be finished with predominantly natural and durable materials such as stone and brick. Pre-cast panels or replica materials (such as pre-cast concrete panels made to look like brick/stone) should only be shown above the 3rd storey).

Response: *The design direction noted above will be pursued at the Site Plan stage.*

Sustainable Design (pg.15)

Comment 1: Please address the opportunity for including greenroofs (or other appropriate LID measures) and the integration of tree planting systems where practical are encouraged.

Response: *A range of 'green' design and development strategies such as greenroofs and LID measures will be considered at the Site Plan stage.*

Comments on the Concept Plan

Comment 1: The midblock connections between the stacked townhouse blocks appear to be too narrow. Revise so that the midblock connection is a minimum of 5-6 metres wide with a 2 metre pedestrian clearway.

Response: *The concept plan and the zoning by law have been adjusted to reflect the 5 metre building separation direction, and pathway design will be to City standards, as per the Site Plan review process.*

Comment 2: A key concern with stacked townhouse units is that there can be little room for the inclusion of trees. Therefore, showing the trees in front of the units is strongly supported. However, double row of surface parking spaces is not currently broken up by any trees. Please revise to show some trees within the parking field help break up the hard surfaces (e.g. near each of the midblock connections).

Response: *Trees have been shown and will be detailed at the Site Plan stage.*

Comment 3: Shift the location of the single loaded stacked towns adjacent to the Tower 6 so that it is more in line with the adjacent stacked town block.

Response: *This can be addressed at Site Plan stage.*

Comment 4: Revise Towers 3 and 4 to comply with the angular plane from Whitelaw (see further discussion above).

Response: *The angular plane requirements have been met as the buildings are shifted back from the street.*

Site Plan Issues

Comment 1: As part of the site plan process further detailed comments will be discussed including:

- Developing the elevations including materials and colours. It is understood that the elevations shown are conceptual. The material between change between the base and the upper storeys is supported. The use of real masonry products within the first 3 or 4 storeys of the building should be used rather than replica materials.
- Adequate soil volumes for trees over the underground parking is critical. Consideration of alternative technologies (Silva Cell) to achieve soil volumes, especially in areas where there is competing need for hard pavement, is strongly encouraged.
- Provide a detail for pedestrian level lighting and street lighting for the internal streets.
- Street furniture such as bicycle parking, benches etc.
- Implementation of a minor gateway near Paisley and the City's boundary.
- Implementation of any wind study recommendations.
- Keep in mind bird-friendliness strategies in the design of the elevations.
- Street furniture such as bicycle parking, benches etc.
- Rooftop mechanical screening
- Continued encouragement of green roofs and LID systems.

Response: *All of these matters will be addressed at the Site Plan stage.*

PARKS AND RECREATION DEPARTMENT (dated August 2, 2019)

Public Services Comments (for 360 Whitelaw Road Resubmission, Memo dated August 2, 2019)

Development Concept

Parkland Dedication:

Comment 1: As noted in previous comments, the City's new parkland dedication by-law would require a minimum of 1.4ha of parkland based on the proposed number of units (700). The park size shown on the concept plan is satisfactory as parkland dedication for this development. Details of the severance and dedication will be determined at the Site Plan Application Stage.

Response: *Acknowledged.*

Park Block Lot Frontage:

Comment 1: The resubmitted concept exceeds the minimum requirement of 50 metres of park frontage with a proposed frontage of 69.7m. Although this does not satisfy the ideal condition outlined in the City's Zoning By-law of 1 metre of Park Lot Frontage for every 100 square metres of park area, Park Planning finds this improvement acceptable. That being said, the applicant is encouraged to explore opportunities to meet the 140m of frontage requirement during the Site Plan Application stage.

Response: *Acknowledged.*

Park Block Location and Pedestrian Circulation

Comment 1: As per previous meetings, discussion and comments, pedestrian circulation from Paisley to Shoemaker would make the parkland behind homes more active and promote natural surveillance of the park. The current site design shows this connection; however most of this connection is through trails and sidewalks through the private development.

Along the north edge of the park, the City requests a sidewalk to connect into the trail. A shared access agreement along the north edge of the park should also be explored in future meetings with the applicant to provide access and potential future parking in the park.

Park Planning requests that a City-owned Trail (or easement in favour of the City) be designed along the property line from Paisley to Shoemaker. A City Trail connection along the edge of the development in public ownership would greatly benefit this neighbourhood as there are currently no off-road trails in the area. Staff have some concerns about the current design and having a trail/pedestrian connection that appears public traveling through a private development mainly because of liability and ongoing maintenance concerns. Publicly accessible and owned trails are mutually beneficial to the condo/rental owners. It would be beneficial to work out the details of the trail at this stage to make sure it is zoned appropriately (P1).

This City trail would be considered a secondary trail (2.5m wide with 0.3m mow strips) and need to meet the FADM requirements (grades of <5% and 2% cross slope). Detailed grading can be worked out at the Site Plan Application stage.

As per previous comments, the City would be interested in discussing with the applicant the possibility of dedicating land or 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/Parkwood Gardens Park at the zoning stage.

Response: *A proposed trail has been shown conceptually on the concept plan and will be investigated further with City staff at the Site Plan stage.*

Functional Servicing Brief

Preliminary Park Block Grading

Comment 1: A preliminary Park Block grading plan was not provided in the most recent submission. From the interim grading plan, it appears that lower portion of the site will be grading with approximately 6% slope, then 2-5% slope to Shoemaker and the park entrance off Whitelaw Road appears to be 15% slope. These grades suggest that most of the tableland is provided at the back of the park and behind existing homes. Park Planning understands the challenging grades for this property; however, it appears that the development site has been graded mostly to a 5% slope throughout.

These grades are not acceptable for a park block. With the City's FADM requirements to provide accessible paths of travel through the park (between 2% and 5% slopes) it will be difficult to make a future park function with these proposed grades. Tableland and more gradual grades should be provided closer to Whitelaw Road in order to provide activity closer to the road for better surveillance. Furthermore, the table land provided behind the existing homes on Whitelaw and Shoemaker is currently naturalized. Parks would accept steeper grades in this area in order to preserve the existing trees.

Parks Planning requests that with a resubmission, a grading plan should be included demonstrating how a playground and accessible trail connection can be provided in the park. Grading for the connection to Shoemaker bulb should also be provided. At this point, Park Planning is not convinced that this land can be suitable for future park needs.

Response: *A preliminary Park Block grading plan has been included with this submission.*

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. Parks would support the preservation of this natural feature, provided that adequate tableland can be provided closer to Whitelaw.

Response: *There is limited ecological value to the 'cultural meadow' and this area will be disturbed with site grading. It is appropriate to include it within the park.*

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: *The site grading plans submitted herein illustrate how the site can be shaped to provide a useful and interesting park area. A range of program options will be pursued with staff at the design stage to ensure a range of activities are provided here to serve the neighbourhood. The site as configured provides adequate street frontage and visibility in our opinion.*

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: *There will be surveillance of the park from street views (Whitelaw, Shoemaker), rear yards of the residences on Whitelaw, from the new development, and from people on the trail which will run from Paisley to Shoemaker. Connections will be available at several points.*

Environmental Impact Study

EIS & Tree Preservation Plan

Comment 1: There is a small cultural meadow community located in the southeastern corner of the subject property on the proposed park. Park Planning is supportive of this area to remain as a meadow and the grading to be minimal in this area – provided that the goals of creating an active park space closer to Whitelaw/proposed development can be achieved. If an active park block cannot be achieved then Park Planning would not be supportive of keeping this area. The edge of the natural meadow should be mowed/pulled back to allow for more active park space.

Should this area remain as a meadow:

Some remedial work will be required including the removal of ash and buckthorn and pruning of trees remaining trees. Also, a meeting with the City's Forestry Department on site should be arranged to review the trees. In the EIR, please include an approach to the remediation of this area and invasive species removal if the applicant chooses this approach.

Response: *Opportunities for restoration and remediation, including potential removal invasive species, removal of dead/hazard trees, and pruning of existing trees, will be incorporated into the detailed site design as part of the Site Plan Approval process.*

Comment 2: Trees no. 839, 843, 844, 845, 850- 853, 859-864 appear to be in good condition and may warrant protection provided grading in this area can be minimized. If the grading in the park can be reworked as described in comments above, there may be opportunity to retain these trees.

Response: *A summary of inventory findings, high level tree retention and removal analysis, mitigation and protection measures, as well as compensation requirements are included in the Tree Inventory and Preservation Plan, appended to the Environmental Impact Study (NRSI 2018). As part of the detailed site design during the site plan approval process and once the site layout has been confirmed, opportunities for tree preservation will be further examined.*

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.*

Transportation Comments (for 361 Whitelaw Road, e-mail dated August 9, 2019)

Comment 1: Transportation Engineering staff have completed a reviewed of the “Additional Transportation Information” report by Salvini Consulting, dated May 28, 2019, in support of the Paisley Park mixed residential development on Whitelaw Road. Staff agree with the recommendations and will require the applicant to provide detailed engineering drawings and all costs associated with the implementation of the road works to facilitate the development. As per the recommendations in the report, the development will require a westbound left turn lane on Paisley Road at the proposed access. The westbound left turn lane will require 15 metres of storage and the appropriate taper length as per TAC. The 25 metre northbound left turn lane on Whitelaw Road at Paisley Road will be incorporated into the Whitelaw Road reconstruction project, this will increase the intersection capacity to improve the northbound right turn movement. Staff also agree that the exact location of the proposed accesses on Whitelaw Road will be reevaluated during the site plan process and after the reconstruction of Whitelaw Road, to ensure that adequate sight lines are maintained.

No further technical analysis is required.

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 me or Glenn Scheels on the planning matters.

Yours truly,

GM BLUEPLAN ENGINEERING LIMITED

Per:

A handwritten signature in blue ink, appearing to read 'AKroetsch', written over a light blue horizontal line.

Angela Kroetsch, P.Eng.

AK/pw

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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